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ABSTRACT

The Institutional Self Study Form for Postsecondary Institutions (ISSF) has been developed to help accreditation agencies provide consumer protection to college and university students. It is designed to detect and quantitatively scale the potential for abuse in institutions, and can be completed by anyone who is knowledgeable about the consumer protection policies, practices, and conditions of that institution. The ISSF consists of 123 weighted items on potentially abusive practices, divided into nine categories: (1) misleading recruiting practices and lax admissions policies; (2) lack of necessary disclosure in written documents; (3) misrepresentation of accredited status; (4) inequitable tuition refund policies; (5) inadequate procedures to insure qualified and stable faculty; (6) inadequate record-keeping; (7) failure to maintain relevant and up-to-date occupational training programs; (8) inadequate job placement services; and (9) financial instability. This instrument was field tested in nine institutions granting associate's, bachelor's, or graduate degrees. Participants were interviewed for their opinions and suggestions for improvement, which are reported. The ISSF is appended, along with its user guide, an explanation of the weighted scoring system, and sample reports. (GDC)

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ACCREDITATION AGENCY FIELD TEST OF INSTITUTIONAL SELF STUDY FORM

IMPROVING THE CONSUMER PROTECTION FUNCTION IN POSTSECONDARY EDUCATION

Charles W. Dayton
Steven M. Jung

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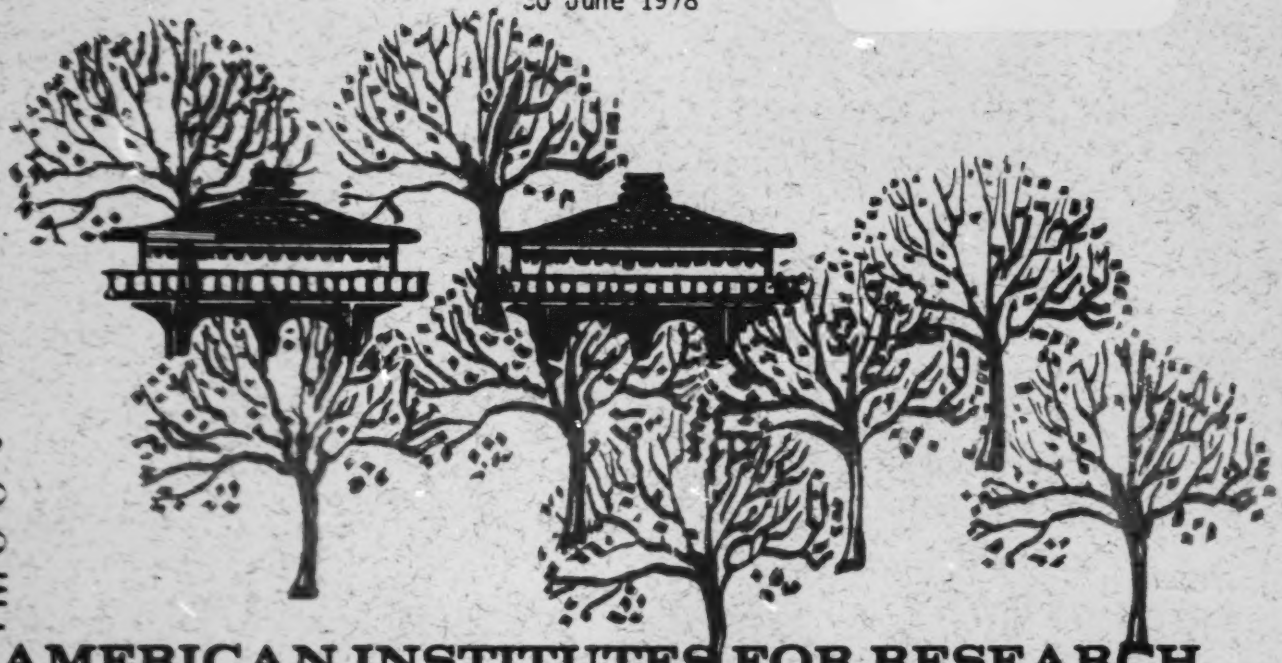

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INTRODUCTION

Background

In the spring of 1977, staff of the American Institutes for Research (AIR) completed work on a system designed to improve the role of accreditation agencies in providing student consumer protection in postsecondary education. The system (see Jung, Gross & Bloom, 1977) was based on two questionnaires designed to detect and quantitatively scale the abuse potential that existed in nondegree- and degree-granting postsecondary institutions. The questionnaires, called Institutional Report Forms (IRFs), could be filled out by any person who was knowledgeable about the consumer protection policies, practices, and conditions of an institution and scored via a specially-designed computer program that was also part of the system. The U.S. Office of Education-supported development and field testing of the system in a number of institutions around the country are described in Jung (1977a).

One of the major recommendations of the final technical report of the initial development study (Jung, Hamilton, Helliwell, Gross, Bloom, Shearer, McBain & Dayton, 1977) was that USOE-recognized accreditation agencies should be encouraged to use the IRF system to promote an increased awareness of student consumer protection issues in accreditated and candidate institutions. In citing this recommendation before a meeting of all recognized accreditation agencies, convened by USOE's Division of Eligibility and Agency Evaluation (DEAE), Jung (1977b) found considerable expressed interest in attempting an immediate field test of the system. The major purpose of the field test was to estimate applicability and receptivity for wider adoption among accreditation agencies in general and regional accreditation agencies in particular. With support from the Office of Planning, Budgeting, and Evaluation (OPBE) in the form of a 12 month extension of the original contract, the field test was begun in July of 1977.

The Data Collection and Scoring Mechanism

The two IRFs (for nondegree- and degree-granting institutions) were based on an intensive analysis of actual cases in which institutional conditions, policies, and practices proved abusive to students. The intent of the IRF items was simply to determine whether or not such conditions, policies, and practices did exist at respondent institutions. There was no necessary assumption that the measured presence of any particular condition, policy, or practice

constituted student consumer abuse. Rather, the assumption was that each detected case represented a potential for abuse, and that the more cases detected, the greater the potential. The critical requirements for including an item in the IRFs were:

- it related well to an institutional condition, policy, or practice that is generally agreed to be abusive (or the absence of which is generally agreed to be abusive) to students (i.e., it had face validity);
- it clearly indicated the direction of undesirability with no complex statistical transformations or unverified rationales required;
- it could be weighted, such that quantifiable scores could be produced, with higher scores representing greater potential for abuse;
- it could be verified, either through easily accessible documentation or alternate information sources;
- it could be marked without imposing an unreasonable burden on the respondent institution;
- it tapped conditions, policies, and practices which are modifiable and within the power of every institution to modify; and
- it was at least potentially useful to an institution in its own self-study and self-improvement efforts.

The IRF scoring system was simply a method of weighting and averaging the sum of the scores produced by items to which positive responses were obtained. A 1976 field test of the system in 37 institutions around the country produced the distribution of institution scores shown in Table 1. These could also be broken down into topic scores which provided profiles of specific consumer protection areas, such as recruiting, disclosure, faculty stability, and financial stability (see Jung, Gross & Bloom, 1977).

For the regional accreditation agency field test, it was necessary to modify the IRF for degree-granting institutions into a self-administered, self-scorable questionnaire suitable for accreditation self-study applications. The topics included on the modified instrument, called an Institutional Self-Study Form (ISSF), are listed in Table 2. Based on an adjustment of the field test data, AIR staff generated the "norms" for the ISSF displayed in Table 3.

Table 1

Institution Scores for Occupational Institutions

in 37 Institution ICAS Field Test

School Number	Institution Score	Rank
11	90	1
23	140	2
1	150	3
9	170	4.5
20	170	4.5
12	180	6
13	200	7.5
17	200	7.5
14	210	9
22	230	10
21	270	11
34	280	12
30	290	13.5
31	290	13.5
32	300	15
25	320	16
10	340	17.5
37	340	17.5
8	350	19
15	370	20.5
19	370	20.5
5	380	22
33	400	23.5
35	400	23.5
2	430	25

Institution Scores for Degree-Granting Institutions

in 37 Institution ICAS Field Test

School Number	Institution Score	Rank
3	110	1.5
26	110	1.5
28	120	3
29	150	4
16	160	5
6	170	6
18	180	7
4	210	8
7	220	9.5
36	220	9.5
24	230	11
27	300	12

Table 2

Types of Potentially Abusive Institutional Conditions and Practices (ISSF Topics)

1. Misleading recruiting and lax admissions policies and practices.
2. Lack of necessary disclosure in written documents
3. Misrepresentation and misuse of approved and accredited status.
4. Inequitable tuition and fee refund policies and failure to make timely refunds.
5. Lack of adequate procedures to ensure qualified and stable instructional staff.
6. Inadequate recordkeeping practices.
7. Failure to maintain up-to-date and relevant instructional programs, especially in occupational/professional preparation programs.
8. Lack of adequate job placement services (if promised), and lack of follow-up of former students.
9. Financial instability.

Table 3

Maximum Possible ISSF Scores and Score Ranges Expected from Cross Section of Institutions

Topic	Weighted Items	Maximum Score	Expected Range
1	18	1,560	100-400
2	38	780	50-250
3	6	1,330	0-500
4	11	1,125	100-400
5	13	1,075	100-500
6	8	1,125	125-500
7	8	2,140	250-750
8	14	1,140	100-500
9	7	1,250	0-400
Institution	123	1,140	100-300

FIELD TEST PROCEDURES

Organizational Meeting

The accreditation field test of the student consumer protection questionnaire began officially on 1 July 1977. On 27 July an organizational meeting was held which brought together at the AIR Palo Alto office the following individuals: Dr. William MacLeod and Dr. Daniel Maloney from the New England Association of Schools and Colleges; Dr. Thurston Manning and Dr. Charles Cook from the North Central Association of Schools and Colleges; Dr. William Langsdorf from the Western Association of Schools and Colleges (senior commission); Dr. Salvatore Corrallo and Dr. William Green from OPBE; Dr. Larry Friedrich from DEAE; and Dr. Steven Jung, Mr. Charles Dayton, and Mrs. Carolyn Helliwell from AIR.

The meeting agenda covered eight topics:

- Project schedule
- Role of USOE, AIR, and accreditation agencies in the project
- Expected outcomes of the study
- Revision of the Institutional Report Form (IRF) to an Institutional Self-Study Form (ISSF)
- Development of an accreditation agency User Guide for the ISSF
- Selection of field test schools
- Purposes of on-site briefings by AIR staff members prior to evaluation team site visits
- Coordination of field test with DEAE use of the IRF

A number of decisions resulted from discussion on these topics, including:

1. The field test would focus primarily on degree-granting institutions, although one or two nondegree-granting institutions might be included.
2. The field test would be limited to the three regional associations of schools and colleges, although the desirability of including proprietary schools and other specialized institutional accreditation agencies in the future was generally agreed upon.
3. Each institution included in the field test might employ the Institutional Self-Study Form (ISSF) somewhat differently. This was considered desirable. AIR would supply adequate copies (up to 25) to each institution for use as desired by institutional staff. One "official" version of the ISSF should be completed and made available to the evaluation team and AIR from each field test institution.
4. AIR staff would not accompany accreditation site visits teams on their actual evaluations of the field test schools.

5. The ISSF focus on traditional, undergraduate, on-campus programs was recognized and discussed. While no action was recommended, it was agreed that it would be desirable at some future point to address more directly nontraditional, off-campus, and graduate programs.

6. It was agreed that the preliminary ISSF would be revised in a variety of ways. The guiding principles were to make it as easy to use and inoffensive as possible, and to allow school staff to score the form more easily.

7. It was agreed that a User Guide would be developed to accompany the form. The purpose of the guide would be to explain the background of the field test, detail categories of potential abuse, explain the structure of the ISSF, suggest possible uses of the form in the accreditation process, indicate where data requested on the form could be found, explain how to interpret topic and overall scores, and provide categories and examples of exemplary policies and practices.

In addition to these decisions, selection of field test schools was begun, and a project schedule and task list were initiated.

Sample Selection

In the month following this meeting, the ISSF* was revised and the User Guide* was prepared in accordance with the recommendations of the conference participants. In addition, selection of field test sites was completed. Selected schools were chosen to include a cross section in regard to ownership status, size, degrees granted, urban/rural location, and general "character." The nine institutions chosen, and their type, are displayed in Figure 1.

Schedule

Most of the sampled schools were scheduled to receive a visit from an accreditation evaluation team in the spring of 1978. Thus it was decided that a project representative would visit each campus in the fall, in the company of an accreditation agency representative, to deliver the ISSFs and User Guides, explain the purposes and procedures of the field test, and answer any questions posed by institution representatives. The institutions would then have until the spring to complete the forms and attach an official completed copy to their self-study. At the time of the evaluation team's spring visit, an AIR project representative would again travel to each of the campuses to meet with the team, explain the field test, and answer any questions team members might have about it. Both college representatives involved in completing

*These are contained as Appendices A and B to this report.

Figure 1

Field Test Schools

Region	School	Type
New England	Northeastern University Boston, Massachusetts	Private, graduate degree-granting university
	Nathanial Hawthorne College Antrim, New Hampshire	Private, B.A. degree-granting college
	Newbury Junior College Boston, Massachusetts	Private, A.A. degree-granting junior college
North Central	University of Iowa Iowa City, Iowa	Public, graduate degree-granting university
	Northwood Institute Midland, Michigan	Private, B.A. degree-granting college
	Cuyahoga Community College Cleveland, Ohio	Public, A.A. degree-granting junior college
Western	University of California, Riverside Riverside, California	Public, graduate degree-granting university
	Stanislaus State College Stanislaus, California	Public, B.A. degree-granting college
	Art Center, College of Design Pasadena, California	Private, B.A. and M.A. degree-granting college

the form and evaluation team members would then be interviewed by telephone, following the spring visit, to gather reactions.

Orientation Visits

The orientation visits were made during the months of September and October, 1978. Institution representatives were encouraged to include faculty and students in their survey along with administrators knowledgeable on each of the nine topics included in the form. Twenty-five copies of the ISSF were provided each school for this purpose, along with five copies of the User Guide. Officials of each school were asked to use as many forms as they thought advisable, but to definitely collapse the results into one "official" completed copy to be attached to their self-study and submitted for evaluation team review. The procedures actually followed by the institutions are detailed in the Results section of this report.

Evaluation Team Visits

Two of the selected institutions actually had evaluation team visits in the fall, one in October and one in November; six had the visits in the spring, one in February, one in March, two in April, and two in May; and one institution had the visit postponed to the fall of 1978, for reasons unrelated to the project. At each institution an AIR staff member met with the evaluation team on the day prior to the beginning of its visit, to explain the field test, answer questions, and arrange for followup telephone interviews. The teams varied somewhat in their receptivity to the field test and the use made of the information presented. Again, a description of this response to the field test will be included in the Results section.

Followup Interviews

Following each evaluation team visit, both college representatives involved in completing the ISSF and evaluation team members were contacted by telephone, to gather reactions and feedback. An interview guide was developed to structure these interviews and assure comparability of information. It focused the interviews on how the ISSF was used, whether it increased awareness of student consumer protection issues, whether it helped to identify problems at the institutions, how it might be improved, and whether it should be used generally in the accreditation process. Outcomes of these interviews are contained in the Results section.

Problems

Problems occurred which interfered with the completion of the field tests at two of the institutions. At one school, as already indicated, the evaluation team visit was postponed until the fall of 1978, eliminating any feedback from evaluation team members. This institution did complete the ISSF and will use it in the fall review. At another school, an official copy of the ISSF was never prepared and submitted to the evaluation team. Thus no feedback was gathered from this site. An alternative school was selected in this instance, and although it received the forms too late for a fully satisfactory involvement, staff did make an attempt to use the forms. Lesser problems involved the varying seriousness with which institutions and evaluation teams regarded the field test. These varying reactions, however, constitute one part of the study's results.

RESULTS AND DISCUSSION

Participation

The first outcome measure of interest in this study is the reaction of institution and evaluation team representatives to the field test, as measured by their degree of responsiveness to it and the effort they put forth. Just how much did each of these groups do related to the field test?

Institutions were given a good deal of latitude in terms of their level of participation. Their minimal requirements for participation consisted of completing some number of forms (each was provided 25 copies), submitting one official copy with their self study, and allowing project personnel to contact them by telephone to gather their reactions following the evaluation visit. Institution reactions varied in a number of ways.

One variation was the groups (administrators, faculty, students) from which an institution sought ISSF information. Institutions were encouraged to involve faculty and students in this process, as well as administrators. Three of the institutions relied almost exclusively on administrators to complete the forms. In each such case, administrators most expert in each topic area were asked to complete that part of the form, and the results were then collapsed into one official version. Six schools attempted to involve faculty and students on some basis. Typically, three to six individuals in each category were asked to complete the form, and their responses were considered in preparing the official version of the form. Faculty and students generally had limited knowledge of the topics and items on the form; thus administrators most knowledgeable on each topic were generally relied on most strongly for information, at all institutions.

A second variable of interest was how students would be chosen for participation, if they were involved at all. Those who actually contributed were not generally selected by a random procedure; rather, older students more apt to be knowledgeable about the college were usually involved. College staff were very open about discussing this selection procedure, and the generally fragmentary knowledge even older students had supports the wisdom of not involving randomly selected students.

A third question was the size and quality of any reports institutions would prepare to accompany the completed ISSF. It was suggested to schools that they offer some evidence of having digested what they found from the form,

and indicate their reactions to any problems uncovered. Two of the schools prepared fairly extensive reports to accompany their official copy of the completed form; one prepared a one-page overview of the results; five prepared just the official copy of the ISSF; one, as indicated, prepared nothing and dropped out of the field test; and one, whose visit will take place in the fall, may prepare an accompanying report.

A fourth question was whether institutions would make the ISSF and its results an integral part of their self study and whether they would make the results available to evaluation teams. Three schools provided the official ISSF as a direct attachment to their self study, making it available in advance to evaluation team members, and one sent it to evaluation team members in advance of their visit, but not attached to the self study; two of these schools were the ones that included reports along with their official copy of the ISSF. Three schools did not attach the completed ISSF to their self study, but made copies available to evaluation team members on their arrival at the institution; this allowed no time for advance review. The reasons for this failure to adhere to the field test requirement were difficult to ascertain; it was probably a mixture of passive resistance and bureaucratic inefficiency. One school, a backup institution chosen to replace the school that dropped out, simply did not have time to complete the ISSF in advance of the evaluation team's visit. And one school's visit was postponed until the fall.

These four measures provide an overview of how seriously school officials took their participation in the field test, and their reaction as gauged by the effort they put forth. How did evaluation teams respond?

As with the institutions, evaluation teams were given a good deal of latitude in their use of the ISSF results. They could choose to explore the results in depth on their visits, only slightly, or not at all. The one stipulation made in advance was that no school would be denied reaccreditation based on its ISSF score.

As discussed above, only four of the evaluation teams received copies of the completed forms in advance of their visit. In those instances where copies were not available in advance, it was difficult for team members to take the time to review the information in depth on site, and limited use was made of the results. Generally one or two team members, exploring areas not closely related to the topics on the form, would ask a few questions where possible problems had been uncovered through other inquiries. The four teams that

did receive a completed ISSF in advance of their visit generally made a somewhat more thorough attempt to followup possible problems uncovered by the form, and in several instances a discussion of such problems was included in the team's report. In no instance was the topic of student consumer protection a central topic of the evaluation team's attention, however.

ISSF Scores and Reports

A second measure of the field test's results is the scores achieved by the participating institutions, and the reports they produced to accompany the completed ISSF. These scores are contained in Column A in Table 4. To provide perspective, they are presented alongside scores achieved by a group of institutions which participated in an earlier IRF field test which involved self-administered forms, but not self-scoring (Column B). They are also compared to a field test in which IRF scores were based on neither self-administered nor self-scored forms, but external ratings of the institutions (Column C).

Table 4

ISSF Scores, Compared with Earlier IRF Field Tests

	Column A Self-Administered and Self-Scored Results	Column B Self-Administered, Externally Scored Results	Column C Externally Administered and Scored Results
N:	9	9	12
Range:	100 - 241	69 - 233	106 - 309
Mean:	181	143	187

The data in Table 4 suggest that institutions were quite honest in their responses on the form. The mean score institutions assigned themselves was very near to those assigned to a similar cross section of institutions by external raters in an earlier field test, and was higher than those achieved by institutions who self-administered the form without knowing the weightings of the various responses to the items. Keep in mind here that the higher a score, the greater the potential for student consumer abuse. The honesty suggested by this comparison was generally reinforced in the followup interviews with evaluation team members, who cautioned that there was a possibility for misrepresenting an institution's status with the self-scoring approach, but that they were impressed at how completely honest the school they visited had been,

even when it put the school in a bad light. There is, of course, the possibility that institutions were more careful and honest in their responses, knowing an accreditation evaluation team would be able to check on what they claimed. Without such a backup of some variety, honesty in responses might be a problem. The spirit with which most school officials took on the task of completing the ISSF argues against this. They tended to view the exercise as a useful way to gain perspective on themselves and gauge themselves against an external measure. But the use of some sort of auditing system with self-administered and self-scored ISSFs may be desirable, or even necessary.

As mentioned earlier, it was suggested to institution staff that once they had collected the information asked for in the ISSF, they should show some evidence of having processed this and indicate how they intended to deal with any problems uncovered. Two institutions did this, in both cases rather admirably.* A third which had its evaluation team visit postponed until the fall, may. One school prepared a one-page overview of its findings.* Five schools prepared only the completed official version of the ISSF, and one prepared nothing and dropped out of the field test. Officials at several of the schools, however, felt that the field test uncovered weaknesses that required action. Followup interviews at seven of the nine institutions which participated suggested that at least one specific problem was uncovered that will require a response, and while the responses had not yet been clearly defined at all sites, they had been at several, and were being worked on at the others. In most cases the problems so identified were neither widespread nor severe. They generally involved the information provided students on various policies and practices. More detail will be provided on this point in the section to follow, which tallies results from the followup interviews.

Followup Interview Results

A central source of feedback on the field test's results was the followup telephone interviews conducted with institution and evaluation team representatives involved at the nine states. These lasted an average of 10 to 15 minutes each, and were structured around a series of six questions:

- How was the ISSF used by the school/evaluation team?
- Whether/how was awareness of student consumer protection issues increased?

*These reports are contained in Appendices C, D, and E.

- Whether/what specific problems were identified at the field test schools?
- What action was defined to solve any such problems?
- Reactions to the ISSF and field test procedures and suggestions for improvements?
- Whether the ISSF would be a useful addition to the accreditation process generally?

Each institution appointed one administrator in charge of the field test. These individuals were interviewed, then asked for suggestions of others who were involved in filling out the forms and that had reactions to it. Likewise, each evaluation team chairperson was interviewed and was asked for suggestions of others on the team who were involved with the form and that had reactions. Typically, a total of four to six persons were interviewed per site between the two categories.

Tallies on the interview questions. The first followup interview question dealt with what use was made of the ISSF by the school and evaluation team. This matter was discussed in the previous section.

The second question involved whether the ISSF increased awareness of student consumer protection issues on the part of those who filled it out. Responses to this question were divided into four categories: yes; qualified yes; qualified no; and no. The middle two categories were necessary to accommodate the many respondents who said, "Yes, but..." or "Sort of..." or in some other way did not express a clear yes/no response to the question. Results among the two groups (institution representatives and evaluation team members) were as follows:

	Increased Awareness			
	Yes	Qualified Yes	Qualified No	No
Institution Representatives	10	7	3	1
Evaluation Team Members	6	6	7	3

In all cases respondents who answered "yes" could provide examples of ways in which awareness was increased; some of the "qualified yes" respondents could provide such examples, and some could only offer a general sense that people were more focused on the issue.

The third question in the interview dealt with whether actual, identifiable problems related to the ISSF were identified in the field test. Responses were categorized in the same manner as the second question, with the following results:

	Problems Identified			
	Yes	Qualifed Yes	Qualified No	No
Institution Representatives	7	4	8	2
Evaluation Team Members	5	1	8	8

Again, all individuals responding with a clear yes could give examples, an average of 1.9 per person. Those answering "qualified yes" were split; three provided examples, two did not, with the average number offered being 1.0.

What the institution's response would be to identified problems was the fourth interview question, and definitions tended to depend largely on the nature of the problems. In all cases a feeling was expressed that there would be some institutional response; in some cases this respond had already been defined; in other cases it had not.

Some of the issues that stood out as needing attention at one or more institutions included providing more explicit information in the college catalog, conducting fuller or more systematic student evaluations of faculty, eliminating deceptive or potentially misleading advertising or recruitment practices, and improving followup of graduates, especially in terms of employment in fields for which they had prepared. The overriding theme was the need for better communication between the institution and its students.

The fifth question asked for feedback on the ISSF and field test procedures. Many positive and negative comments were received. Respondents were particularly probed for suggestions for improvements. Comments were classified into three categories: (1) positive, (2) negative or questioning, and (3) recommendations for improvement. Comments were as follows:

	Comments		
	Positive	Negative/Questioning	Recommendations
Institution Representatives	16	24	10
Evaluation Team Members	11	29	15

It should be noted that while there were many negative comments and much questioning, this is essentially what was being requested in this item. Details of the comments made in each of these categories will be presented in a section to follow.

The sixth question asked was whether the ISSF would be a useful addition to the accreditation process at other schools (i.e., generally). Results on this question:

ISSF Useful Addition

	Yes	Qualified Yes	Qualified No	No
Institution Representatives	12	5	4	0
Evaluation Team Members	1	15	4	2

Qualifications here often related to criticisms or suggestions made on item five. Respondents felt that if such and such a change were made, or if the form were only used with a given type of school, it would be useful. This was particularly true of evaluation team members.

Positive comments. Many positive comments were made about the form and field test in the telephone interviews. These tended to cluster around three themes:

- The form was well structured.
- The field test defined and focused attention on the topic of student consumer protection.
- The topic is a relevant and timely one, requiring attention.

Many of the people interviewed offered compliments about the ISSF. Virtually no one thought it was too long. Positive comments were made about the yes/no format, clarity, simplicity, thoroughness, efficiency, and self-scoring of the instrument. Two individuals commented that it was easier to use and less painful than they had expected. In general, the design and quality of the instrument itself seemed to be well received.

Many interviewees felt that the form and field test served a useful function in focusing attention on the issue of student consumer protection, and lending it needed clarification. This was expressed many ways -- consciousness raising, focusing on grey areas, pinpointing what a committee should look at, and illuminating an issue that is no one's "natural business" at a college. The form was also seen as a useful checklist and self-evaluation aid for institutions, apart from the accreditation process.

While the feeling about the importance of the problem of student consumer protection was mixed, a number of interviewees commented on this importance as a strength of the field test. With increasing competition for students, and

with the underrepresentation of the student viewpoint typical of the accreditation process, the form was seen as relevant and timely.

Negative comments. Included in this category are not only criticisms of the form and/or field test, but also questions about it. In some instances interviewees raised questions without having definitely concluded there was a problem. Some of these comments also apply to difficulties peculiar to this field test as opposed to the general relevance of the issue and usefulness of the form for higher education. Negative comments fell into five basic categories, including:

- the ISSF weighting and scoring system
- questions of validity associated with sampling of respondents, number of items per topic, sources of information, and honesty of responses
- logistical difficulties
- importance of the problem
- problems with the ISSF itself

These will be discussed individually.

The first issue relates to the weighting and scoring system of the ISSF. Some interviewees found this confusing, either in computing the score or its resultant meaning; some questioned the values assigned to certain responses, and felt value judgments were being made that were not universally accepted in higher education; and some disliked the idea of using scores at all, feeling they implied prescriptive, specific guidelines in what should be a qualitative rather than a quantitative process.

The second issue relates to the question of the validity of the results. Some felt too few individuals were included to allow meaningful conclusions, and that those administrators and faculty who responded could well have been hand-picked; some felt students, in particular, should have been selected by random procedure, and that few negative viewpoints were probably included in completed ISSFs; some felt there were too few items in certain of the topics to give them any real validity as measures of the topics in question. Two factors complicated this issue further. The first was that few faculty members or students were found who knew most of the information asked for on the form; thus the official-completed ISSFs came largely from administrators whose responsibilities lay closest to the topics in question. The second was the issue of honesty; a few interviewees felt there was no way to assure objective responses when the "correct" answer was obvious. It may be note-

worthy that evaluation team members who commented on this felt responses at the school they visited had been very honest; the problem was seen as a potential one, not a realized one.

The third issue identified by respondents concerns logistical problems associated with the field test. These included institution representatives, in some cases, not receiving the form in advance of their preparation of the self-study, making incorporation of the ISSF findings difficult; evaluation team members, in some cases, not receiving the completed ISSF in advance of their visit, making use of the ISSF information difficult; and difficulty in team members' using the information from the ISSF quickly and efficiently, through lack of orientation to the form's content and structure. Complicating this logistical problem was the fact that accreditation visits are very busy, pressured events in the first place and, in some cases, team members already felt overwhelmed with the normal accreditation guidelines and expectations. Where the chief concerns about an institution did not relate closely to the issues surveyed on the ISSF, the extra task of including the field test in the team's review became especially difficult.

The fourth issue relates to the question of whether student consumer protection is a serious enough problem to demand the attention that the field test required. This was questioned in various ways: some respondents felt that higher education was already aware of the issue; some felt that higher education was already so overwhelmed with requests for information that any additional requests should be very high in priority, and weren't sure this issue qualified; some felt that while a few schools might require attention in this regard, most would not. New, private, proprietary, and vocational schools were seen as likelier candidates than established, public, non-profit, and degree-granting schools; one individual felt that the form would "fan the flames" of an issue that is not now important to most students, but might be made so.

The fifth issue relates to problems associated with the ISSF itself. A few interviewees experienced difficulty in interpreting certain questions; some pointed out that on a large campus with many schools and programs, it was difficult to give one answer that would be correct in all cases; some disliked the yes/no format, feeling it oversimplified complex situations; and some felt that the form had a negative tone, implying improper behavior and putting people on the defensive.

Participant recommendations. Along with these positive and negative impressions of the field test, interviewees were asked for their suggestions and recommendations for improvements. These tended to follow the patterns of their negative comments, representing solutions to the problems they identified. Four basic categories of suggestions were received:

- preparing evaluation team members more fully
- improving the sampling procedures
- integrating the ISSF into the accreditation guidelines
- adapting the ISSF in various ways

Some evaluation team members felt that had they understood the ISSF more fully, and had it earlier to study, they could have made fuller use of the information it provided in their visits. Specific suggestions included providing a kit to explain administration of the form, keeping a field test representative on the campus during the team visit, emphasizing the importance of the field test to the team chairperson, providing more information on the meaning of scores and intent behind each topic, and having the team members meet and discuss their use of the form in advance of their visit.

Some interviewees suggested improvements in the sampling procedures and in the field test. These ranged from selecting only institutions apt to have student consumer protection problems, to including a larger, more representative student sample, providing a description of exactly who filled out the form, sampling graduates rather than current students, and sampling employers.

Some interviewees suggested that the ISSF would have received fuller attention had it been viewed as an integral part of the accreditation self-study, rather than a separate field test whose connection was not entirely clear. Specific thoughts in this regard included making it part of the self-study outline, including questions related to the issue of student consumer protection in the self-study outline in place of the separate form, or simply subsuming it as a legitimate requirement for reaccreditation.

Several suggestions were offered in the way of future adaptations of the ISSF or the procedures used in this field test. One thread of thinking was to provide various versions of the form for various types of schools; another was to provide various versions of it for administrators, faculty, and students, asking each only what they would be apt to know; a third was to include versions designed for off-campus/nontraditional programs, where it was felt student consumer problems are more likely to occur; a fourth was to distinguish whether facts or perceptions were being provided when it was filled out.

Suggested changes in scoring included having AIR do the scoring; using a separate answer sheet for computer scoring; providing better norms to indicate what scores mean; and eliminating scores for items on which there is not widespread agreement. Finally, some interviewees suggested: use of the form as a quick diagnostic tool; the desirability of providing institutions a list of good practices; the need to offer recommended actions where problems are uncovered; and the need to allow adequate time for institutions to make changes.

Accreditation Agency Feedback

In addition to the followup interviews with institution and evaluation team representatives, conference calls were held with staff of the three accreditation associations to discuss field test results and impressions the staff had formed. The results of these conversations are briefly summarized in this section.

Representatives from the Western Association of Schools and Colleges' Senior Commission felt that the ISSF would be a great service "to a particular class of institutions," namely proprietary and two-year schools, as opposed to four-year and graduate schools. These representatives felt off-campus programs needed the most attention, and recommended that the ISSF be adapted for use with such programs. It was also pointed out that a number of changes were being made in the WASC accreditation handbook and self-study guide which would give more precise definition on several of the topics contained in the ISSF.

Representatives of the New England Association of Schools and Colleges noted a generally positive reaction to the field test, but with little feedback from participating institutions. One institution had found some noteworthy communication problems from use of the form; another, not a field test site, had found the form very useful in self-evaluation. A general feeling was expressed that the language of the form needed to have a more positive tone.

Representatives of the North Central Association of Schools and Colleges expressed a general satisfaction with their participation in the field test, while noting that evaluation teams in that region varied in the extensiveness of their use of the ISSF findings. The need for an auditing process in future use of the form was discussed; the suggestion was made that a few key items from the ISSF would suffice for auditing and could make the process of

reviewing institutional responses easier for evaluation teams. It was noted that institution staff generally responded more positively to the field test than did members of the evaluation teams, and the suggestion was made that the ISSF, or an abbreviated version of it, might be a useful self-check mechanism for institutions apart from accreditation visits.

All three agencies agreed to act as dissemination points for the ISSF for any future use which schools in the regions might desire. AIR will supply extra copies of the form to each agency for this purpose.

IV. CONCLUSIONS AND RECOMMENDATIONS

In general, the field test results indicate that the ISSF can be a valuable addition to the accreditation process, focusing attention of institutional staff and site visit teams on an important area that too often tends to be taken for granted in regional accreditation. It seems likely that the form might also have considerable promise for use by specialized accreditation agencies that accredit primarily proprietary schools, even though these agencies currently pay considerably more attention to student consumer protection issues.[1] The utility stems mainly from the ISSF's unique capability to require review of specific institutional policies, practices, and conditions and then quantify the abuse potential existing therein. Although a small percentage of institutional staff and accreditation site visitors questioned this orientation as presuming guilt where there may have been none, most participants in the field test accepted the fact that no institution is perfect, no matter how good its intentions, and there is always room for improvement.

This almost universal spirit of cooperation and honest desire for improvement in the student consumer protection area is one of the most encouraging findings of the field test. Cynics such as Harold Orlans and his collaborators (1974) have contended that any attempt to "plant consumer protection in the accreditation process is as promising as a crop of Arctic coconuts." This obviously false assertion has unfortunately appeared as accepted fact in such influential DHEW reports as the Recommendations for Improved Management of Federal Student Aid Programs (Student Financial Assistance Study Group, 1977). The results of the present field test, if properly followed up, should help lay it to rest. The remainder of this section will concentrate on what might constitute proper follow up.

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[1] For example, the "ethical practices" standards of proprietary school accreditation agencies such as the National Association of Trade and Technical Schools (NATTS), the Association of Independent Colleges and Schools (AICS), and the National Home Study Council (NHSC) all contain over 10 pages of prohibitions and requirements on such topics as advertising, recruiting, and disclosure. In contrast, the ethical practice standards of regional accreditation agencies rarely exceed one page.

Development of Alternative Forms

Field test participants recommended at least three alterations of the basic ISSF. One alteration would involve addition of a separate form for so-called "nontraditional" programs, presumably those that utilize off-campus instruction, individualized teaching methods, academic credit for life experience, and so forth. Although such programs are certainly perceived as a problem to accreditation agencies, there is little evidence that the perceived problem is related to potentially abusive institutional conditions, policies, and practices as measured by the ISSF. Rather, the problem seems to involve concern for quality and appropriateness of the educational program that is offered, relative to more traditional academic standards. While this concern, if carried to its extreme, could represent a consumer protection issue, the ISSF is clearly not designed to quantify judgments of educational program quality, per se. Until such time as there is evidence to the contrary, it appears likely that the topics on the current ISSF are as applicable to non-traditional as to traditional programs. Therefore, no need is seen for an alternative form of this nature.

A second alteration would involve creation of a separate form for students and faculty. This form would be designed to solicit perceptions about the consumer protection policies, practices, and conditions at an institution, rather than factual information. Data from this form could help administrators obtain an estimate of areas where student and faculty perceptions differ from fact, with the purpose of doing a better job of information dissemination. While this is clearly a good thing to do, it is probably not a high priority for either accreditation agencies or USOE. Should individual investigators decide to follow up on it, they would do well to investigate the AIR Enrolled Student Questionnaire, developed in the earlier phases of this contract and contained in Jung, et al. (1977).

A final alteration would involve the selection of a few highly discriminating ISSF items to use either as a short screening device by institutions and accreditation agencies or as a brief ISSF verification tool by evaluation teams. AIR staff have already carried out some preliminary investigations which suggest the feasibility of an abbreviated form. Its actual development and validation should represent a high priority for both USOE and individual accreditation agencies.

Application in Different Circumstances

Some participants in the field test observed that the ISSF would be more appropriately used with proprietary schools and vocational-technical institutions than with the degree-granting institutions that participated in this field test. There is no doubt some merit to this observation, especially in that AIR's previous studies (e.g., Jung, et al., 1977) have shown that the abuse potential in proprietary and occupationally oriented schools is higher than in public, non-profit, and academically oriented institutions. A closer look at these results, however, shows that there was some abuse potential in every institution visited, regardless of its type. A more reasonable conclusion seems to be that the current ISSF is appropriate for application at any type of institution, although this study did not test its utility to specialized accreditation agencies that accredit mainly proprietary schools (e.g., NATTS, AICS). The applicability to these agencies would of course depend on their willingness to utilize the form; this willingness should be determined by USOE as soon as possible.

The most troublesome aspect of the ISSF system revealed in the field test was clearly the difficulty experienced by site evaluation teams in verifying the "official" ISSF. It may very well be true that verification of "one more thing" on top of an already highly compressed site visit schedule may be counterproductive. Moreover, there is reason to believe that the major value of the ISSF in suggesting changes in institutional policies, practices, and conditions occurs during the self-study process. The involvement of the evaluation team may be superfluous in many cases. On the other hand, relative to the other self-study areas often validated by visiting teams, it would seem that student consumer protection is equally or even more important. Accreditation agencies should thus consider the addition of the ISSF as a part of their formal site visit checklist, with either the addition of more site visitors or more time for the site visit to concentrate on validating at least a small, selected portion of the ISSF.

Technical Additions to the System

The ISSF and its current User Guide (Appendices A and B) could clearly benefit from the addition of more extensive normative data to help answer the question, "What does a score of this magnitude mean?" The skimpy existing norms are derived from the 37-institution IRF field test conducted in 1976; unfortunately, these are the only normative data available. USOE and any

accreditation agencies considering wider use of the ISSF in a formal sense should preface this use with the collection of normative data on at least 30 institutions, using the widest possible range of institutions, including (1) some known to be in financial difficulty because of declining enrollments; (2) some which use so-called "nontraditional" educational programs; (3) some of proprietary ownership, as well as public and private, nonprofit; and (4) some from states with differing state licensing requirements for private institutions.

In addition, the User Guide could benefit from the addition of (1) a fuller explanation of the various ISSF topics and the intent behind each; (2) a fuller explanation of the item weighting and scoring system, including the derivation of the weights; and (3) a fuller statement of the positive conditions which represent the ideal toward which all institutions should work.

Dissemination

As with all contractor-produced educational products, dissemination of the ISSF and its User Guide may prove to be a major snag to wider utilization. This is a natural result of the fact that, with the expiration of federal funding, the contractor staff (AIR's in this case) normally ceases its functioning as an advocate for the use of the product (the ISSF system, in this case). To survive, the contractor staff must move on to other projects, thus pre-empting serious attempts to promote dissemination.

It is thus essential that USOE and the accreditation community assume responsibility for further dissemination and utilization of the ISSF system. Several specific steps can be taken immediately. First, USOE should immediately make copies of the ISSF and User Guide available to all interested agencies, institutions, and individuals. This availability should be announced as widely as possible, including through the popular publications that concentrate on postsecondary educators, accreditation agency newsletters, newsletters of the higher education associations, and publications of student-oriented organizations. Secondary distribution might be accomplished through the ERIC System, the Council on Postsecondary Accreditation, and the National Student Education Fund.

Second, copies of this report should be made available to major state and federal government policy makers that exercise various recognition responsibilities for accreditation agencies. Agencies willing to utilize the

ISSF on a formal basis should receive official encouragement and support, including possible suspension of certain regulatory student consumer protection requirements on fully accredited institutions, subject of course to investigations and negative sanctions if evidence of actual student abuse is provided through consumer complaints. It would be especially important for outside observers of the accreditation process to be disabused of the untrue assertion that accreditation agencies are unaware of or uninterested in student consumer protection concerns.

Finally, accreditation agency personnel themselves should take the initiative to disseminate the ISSF to member institutions and initiate steps necessary to make student consumer protection an integral and formal part of the accreditation process.

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August 1977

APPENDIX A

INSTITUTIONAL SELF-STUDY FORM

FOR

Postsecondary Institutions

Name of Institution: _____

Date Completed: _____

Completed by: _____

Time Required: _____

INSTRUCTIONS

This self-report form contains nine sections. Each section is introduced by a rationale, explaining the thinking behind the questions in that section. Some individual questions also have rationales. For each section, first read the rationale, then proceed to score your institution on each of the items by checking the appropriate box or boxes, and recording the score for that box in the column to the right. Following is a sample item illustrating the correct procedure.

1. Is teaching competency systematically evaluated at your institution?
   Mark one response.

No	Yes	Weights
☑	☐	1. 3

Some questions call for just one response and some for a series of responses.

To total your score for each topic, add all the scores which have been listed for that topic in the column, and record the sum in the space provided at the end of the section. Directions and a form for computing your overall score are provided on a page at the back. The manual accompanying this form provides guidelines for interpreting both your topic score and overall institution score.

Occasionally you may encounter items to which meaningful responses are difficult. "Not Applicable" options are usually provided in these cases. It is important that you attempt to answer every question. If you cannot fairly respond to one of the options provided, omit that item and provide a brief reason for the omission in the "Additional Comments" section at the end of the form. Omitted items are neither weighted nor included in the scoring.

I. STUDENT RECRUITING POLICIES AND PRACTICES

Rationale for this topic: One method being used more frequently to increase enrollments is intensified recruiting. Unfair recruiting practices may occur when false, misleading, or unsubstantiated claims are made, whether or not this is intentional. All institutions which use the mails, public media, or make personal contacts with potential students in attempting to attract enrollees should be aware that certain specific practices (which are in fact illegal in a number of states) involve a potential for abuse. The Chief Executive Officer of an institution should be responsible for the recruiting practices of that institution. If recruiting is carried out without that officer's review, especially by personnel who stand to gain from increased enrollment, there is a higher probability that questionable practices will result.

1. Does your institution use the following techniques in attracting applicants for admission? Mark one response for each lettered item.

No	Yes		Weights
[0]	[4]	a. Contracting with a private recruiting firm or consultant organization, or employing individuals to stimulate enrollments, when all or any part of the payment is contingent on the number of resulting applications for admission.	1a._____
[0]	[4]	b. Classified ads in the "Help Wanted" section of the newspaper, not for jobs at the institution, but to obtain applications for admission.	b._____
[0]	[2]	c. Competitions or contests designed only to stimulate applications for admission.	c._____
[0]	[2]	d. Published or oral testimonials or endorsements by persons who did not attend this institution.	d._____
[0]	[2]	e. Offers of limited time discounts on tuition charges, room and board charges, etc.	e._____

Weights

2. Does your institution make the following statements in any of its recruiting efforts? Mark <u>one</u> response for each lettered item.

No	Yes		Weights
[0]	[2]	a. Completing the education or training offered at this institution is likely to lead to employment, without accurate supporting data.	2a._____
[0]	[2]	b. Completing the education offered at this institution is likely to lead to admission to graduate or professional school, without accurate supporting data.	b._____
[0]	[2]	c. There are ties or connections between this institution and specific employers which will result in special employment considerations for graduates, when this is <u>not</u> the case.	c._____
[0]	[4]	d. Scholarships or other forms of no-cost financial assistance are available, when in fact none have been awarded during the past year.	d._____
[0]	[2]	e. The educational program at this institution is superior to the educational program offered at competing institutions.	e._____
[0]	[2]	f. Recognized experts or other types of well-known persons are on the undergraduate teaching faculty, when they have no undergraduate teaching responsibilities.	f._____

3. Does a responsible administrative officer of your institution review recruiting materials before they are used? Mark <u>one</u> response 3._____

[6] No.
[2] Some or most of them.
[0] All of them.

Rationale for items 4 and 5: With a shrinking pool of students available for enrollment, recruiting practices may tend to expand to fill the vacuum. If the line dividing fair from unfair practices has been carefully thought out and written down in advance, abusive practices can usually be avoided. Such guidelines particularly need to be brought to the full attention of recruiters.

Weights

4. Does your institution follow a written policy which governs all recruiting practices? Mark one response for each lettered item.

No	Yes	
[6]	[0]	4.

If you filled in "No" to item 4 above, skip item 5 and go on to item 6.

5. Does your institution's written recruiting policy specify the following items? Mark one response for each lettered item.

No	Yes		
[2]	[0]	a. A code of ethics which prohibits certain recruiting practices.	5a.
[2]	[0]	b. A requirement that prospective students talk to a staff member of the institution before enrolling.	b.
[0]	[0]	c. The completion of an enrollment agreement signed by an institutional staff member and the applicant that describes all costs, payment requirements, and educational services to be provided by the institution.	c.

Rationale for item 6: If an institution has an essentially "open" admissions policy, it should also have remedial services to assist students with special needs. Failure to do so may be taking unfair advantage of certain students under the pretense of "giving them an opportunity."

6. For students who are admitted under an "open" admissions policy, or who do not meet stated admissions requirements but are admitted under a special admissions policy, are the following courses provided? Mark one response for each lettered item. If your institution does not practice "open" admissions or does not allow underqualified applicants to be admitted, omit this item.

No	Yes		
[2]	[0]	a. Courses or sections offering remedial instruction in basic English.	6a.
[2]	[0]	b. Courses or sections offering remedial instruction in mathematics.	b.
[2]	[0]	c. Special academic tutoring programs offering remedial instruction related to students' needs.	c.

Total of Topic I Weights

II. DISCLOSURE IN WRITTEN DOCUMENTS

Rationale for this topic: Lack of adequate disclosure by an institution can be intentional or unintentional. If it is intentional and students are misled to their detriment, the result may be considered consumer fraud. Much more common are situations in which lack of adequate disclosure is unintentional, and students make important decisions based on faulty or no information. All institutions should, as a routine policy, disclose certain important facts, both to prospective students and already enrolled students. Students should not have to exert unreasonable effort to seek out these facts, which should be written clearly, in plain English, and made readily available free or at a cost not to exceed the cost of their publication. Note that the items below do <u>not</u> ask whether particular conditions or services <u>exist</u> at the institution, but whether their existence or non-existence is adequately <u>disclosed</u> in public documents.

1. Does your institution disclose information on the following items in its general catalog, bulletin, basic public information document, or a combination of these? Mark <u>one</u> response for each lettered item.

No	Yes			Weights
[1]	[0]		a. Name and address of institution.	1a.____
[1]	[0]		b. Date of publication of the document.	b.____
[1]	[0]		c. Institutional calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.	c.____
[1]	[0]		d. A statement of institutional philosophy or mission and program objectives.	d.____
[1]	[0]		e. A brief description of the institution's physical facilities as related to the instructional program.	e.____
[1]	[0]		f. An accurate list of all courses actually offered, or all subject areas actually taught if separate courses do not exist.	f.____
			←——There are no required courses (N/A).	
[2]	[0]	[0]	g. An indication of when specific required courses will normally be offered.	g.____

No	Yes			Weights
[1]	[0]		h. Educational content of each course, or of the program if separate courses do not exist.	h.____
[1]	[0]		i. Number of hours of instruction in each course, or in the program if separate courses do not exist, and length of time in hours, weeks, or months normally required for its completion.	i.____
[1]	[0]		j. An accurate listing of instructional staff who currently teach.	j.____
			No such distinction exists (N/A).	
[1]	[0]	[0]	k. An indication of the distinction between adjunct or part-time faculty and full-time faculty.	k.____
[1]	[0]		l. Policies and procedures regarding acceptability or non-acceptability of credits <u>from</u> other institutions.	l.____
[1]	[0]		m. General acceptability or non-acceptability <u>by</u> other institutions of credits earned at this institution.	m.____
[2]	[0]		n. Requirements for graduation.	n.____
[1]	[0]		o. Statement of certificates or diplomas awarded upon graduation.	o.____
[1]	[0]		p. Statement of degrees awarded upon graduation.	p.____
[1]	[0]		q. Data regarding numbers and characteristics of students who drop out of this institution before their graduation.	q.____
			This institution has no undergraduate occupational/professional preparation programs (N/A).	
[2]	[0]	[0]	r. Data regarding the employment success of students who graduate from this institution's undergraduate occupational/professional preparation programs.	r.____
			This institution has no graduate occupational/professional preparation programs (N/A).	
[2]	[0]	[0]	s. Data regarding the employment success of students who graduate from this institution's graduate occupational/professional preparation program.	s.____
[1]	[0]		t. Grading system.	t.____
			Policies and rules relating to:	
[1]	[0]		u. Excessive late-arrival for classes.	u.____
[1]	[0]		v. Absences.	v.____
[1]	[0]		w. Make-up work.	w.____
[1]	[0]		x. Student conduct.	x.____
[1]	[0]		y. Termination/withdrawal.	y.____
[1]	[0]		z. Re-entry after termination/withdrawal.	z.____

Weights

2. There are often standard legal limitations or requirements for employment in certain occupations. Examples include medical or health requirements, professional licensing or certification requirements, additional apprenticeships, further training by employers, membership in or registration by a professional organization, and so on. If your institution offers any programs to prepare students for such occupations, are these limitations disclosed in basic public information document(s)? Mark one response.

[4] Such standard legal limitations or requirements are not disclosed.

[0] Such standard legal limitations or requirements are disclosed.

[0] There are no standard legal limitations or requirements for post-training employment opportunities for students at this institution (N/A).

2._____

3. If your institution lacks specialized or professional course accreditation which is normally required for post-training employment of students, is this lack disclosed in public information document(s)? Mark one response.

[4] The lack of specialized accreditation is not disclosed.

[0] The lack of specialized accreditation is disclosed.

[0] Specialized or professional course accreditation is not required for post-training employment of students who complete courses of study offered at this institution, or all courses requiring specialized accreditation are so accredited (N/A).

3._____

Weights

4. Does your institution provide accurate descriptions of the availability and extent of the following student services in its basic public information document(s)? Mark one response for each lettered item.

No	Yes	No service of this type exists at this institution (N/A).		Weights
[1]	[0]	[9]	a. Job placement service or assistance.	4a.____
[1]	[0]	[0]	b. Student counseling for academic and personal problems.	b.____
[1]	[0]	[0]	c. Food service facilities (excluding vending machines).	c.____
[1]	[0]	[0]	d. Housing facilities.	d.____
[1]	[0]	[0]	e. Parking facilities.	e.____

5. Does your institution provide accurate descriptions of the following institutional conditions or procedures regarding the award of degrees? Mark one response for each lettered item.

No	Yes			
		No State agency exists for this purpose (N/A).		
[2]	[0]	[0]	a. Recognition or lack of recognition by a State agency as meeting established educational standards for granting degrees.	5a.____
[4]	[0]		b. Scope and sequence of required courses or subject areas in each degree program.	b.____
		There is no transfer between departments and/or colleges (N/A).		
[2]	[0]	[0]	c. Requirements, policies, and procedures regarding transfer between departments and/or colleges within the institution.	c.____

Weights

Rationale for items 6 and 7: With rising costs, increases in fees are unavoidable. Such increases should be made known well in advance to all students whom they will affect.

6. Are increases in any student fees exceeding $50 currently planned for the next year? Mark one response.

No	Yes	This institution charges no student fees (N/A)
[0]	[0]	[0]

6._____

If you filled in "No" or "N/A" to item 6 above, skip item 7 and go on to item 8.

7. Are the planned fee increases disclosed in writing to all students and prospective students to whom they might apply? Mark one response.

No	Yes
[4]	[0]

7._____

Rationale for item 8: There are many types of approval and accreditation with which students are generally unfamiliar. Nevertheless, their future may be affected by the type enjoyed by the institution or program they attend. The exact nature of an institution's approval or accreditation should be made clear to all prospective and enrolled students. Special care should be exercised to insure that memberships in organizations are not listed so as to imply that the institution has been inspected and approved by these organizations.

8. Do the public representations of your institution clearly indicate (and distinguish between, where applicable) institutional accreditation, institutional memberships in professional organizations, specialized or professional program accreditation, State VA-approving agency course approval, and State licensing and approval? Mark one response.

No	Yes	N/A
[6]	[0]	[0]

8._____

Total of To
II Weights

III. REPRESENTATION OF CURRENT APPROVED OR ACCREDITED STATUS

Rationale for this topic: Students should be accurately informed about the actual status of an institution or its programs with regard to State approval, private accreditation, and any pending legal actions. It is the responsibility of the institution to disclose and not to misrepresent this information. Misrepresentation may cause students to believe an institution has been evaluated and is completely approved, when in fact this is not the case.

Weights

1. Is your institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards by any of the following government agencies? Mark one response for each lettered item.

No	Yes		Weights
[0]	[2]	a. A local government agency (for example, Consumer Protection Agency, District Attorney, etc.).	1a.____
[0]	[2]	b. A State government agency (for example, State Approving or Licensing Agency, Attorney General, etc.).	b.____
[0]	[2]	c. A Federal government agency (for example, Federal Trade Commission, Department of Health, Education, and Welfare, etc.).	c.____

If you filled in "No" to all of the above options, skip item 2 and go on to item 3.

2. Is the fact that the institution is under some form of limitation(s) or sanction(s) publicly disclosed in writing to all current enrollees and applicants? Mark one response.

No	Yes	Weights
[4]	[0]	2.____

Weights

3. Is your institution currently on suspension, probation, or some other form of limitation or sanction for noncompliance with designated standards by any institutional or professional accreditation agency which is recognized by the U.S. Commissioner of Education or the Council on Postsecondary Accreditation? Mark one response.

No Yes ___This institution is not accredited (N/A).

[0] [2] [0]

3.____

If you filled in "No" or "N/A" to item 3 above, skip the next item and go on to the next section, Refund Policies and Practices.

4. Is the fact that the institution is under some form of limitation(s) or sanction(s) publicly disclosed in writing to all current enrollees and applicants? Mark one response.

No Yes

[4] [0]

4.____

Total of Topic III Weights

IV. REFUND POLICIES AND PRACTICES

Rationale for this topic: Institutional failure to refund tuition and other fees collected in advance is one of the most common causes of student complaints. It is recognized that institutions are justified in requiring advance tuition and fee payments and in retaining a portion of these payments to cover processing costs. However, it is generally agreed that all institutions: (a) should have a written refund policy stating clearly when and under what conditions refunds will be granted, (b) should make timely refunds to students who abide by stated institution policy, and (c) should make the policy available to all students in advance of their attendance at the institution.

Weights

1. Does your institution require students to pay or otherwise obligate themselves to pay any of the following fees or charges before enrollment or class attendance? Mark one response for each lettered item.

No	Yes	No such fees or charges exist at this institution (N/A).		Weights
[0]	[0]	[0]	a. Resident (in-State, etc.) tuition or tuition generally applicable to all students.	1a.____
[0]	[0]	[0]	b. Non-resident (out-of-State, etc.) tuition or tuition paid only by certain groups of students.	b.____
[0]	[0]	[0]	c. Room and board charges or deposits.	c.____
[0]	[0]	[0]	d. Application or registration fees exceeding $50.	d.____
[0]	[0]	[0]	e. Other required fees exceeding $50 (excluding books).	e.____

If you marked "No" or "N/A" to all the options above, skip the following three items and go on to the next section, Instructional Staff Evaluation and Stability.

2. Does your institution have a written refund policy regarding all those fees for which "Yes" was checked in item 1? Mark one response.

No	Yes	Weights
[6]	[0]	2.____

Weights

If you filled in "No" to item 2 above, skip the following two items and go on to the next section, Instructional Staff Evaluation and Stability.

3. How is the written refund policy made available to students? Mark one response for each lettered item.

No	Yes		
[2]	[0]	a. It is made available for public inspection at the institution.	3a.____
[2]	[0]	b. It is printed in the institution's general catalog or bulletin.	b.____
[4]	[0]	c. It is distributed to all enrolled students (free or at a cost not exceeding $2).	c.____
[4]	[0]	d. It is distributed to all prospective students (free or at a cost not exceeding $2).	d.____

Rationale for item 4: There are aspects of a refund policy which are desirable for all institutions which collect fees in advance. Students need to know when they qualify for a refund and how they must apply for it. Also, students should be able to assume that institutions will process valid refund requests within a reasonable period of time. Institutions should avoid large nonrefundable application or processing fees, and should never assess such fees without ample advance notice to students.

4. Does your institution's written refund policy clearly specify the following items? Mark one response for each lettered item.

No	Yes			
[4]	[0]		a. Those fees and charges which are not refundable.	4a.____
[2]	[0]		b. All conditions which students must meet to obtain refunds.	b.____
[4]	[0]		c. How to properly apply for a refund.	c.____
			This institution collects no tuition in advance (N/A).	
[2]	[0]	[0]	d. A tuition refund formula by which students pay only for the instruction made available to them.	d.____

No	Yes		Weights
[0]	[4]	e. Any non-refundable application processing fee or other type of non-refundable student fees exceeding $100.	e._____
[2]	[0]	f. A time limitation not exceeding 40 days between receipt of a valid refund request and the issuance of a refund.	f._____
			Total of Topic IV Weights

V. INSTRUCTIONAL STAFF EVALUATION AND STABILITY

Rationale for this topic: Unqualified and unmotivated staff provoke many student complaints. Certain steps, particularly in the form of structured student evaluation, can be taken to evaluate and improve instructional staff and should be carried out as a matter of policy. Furthermore, one of the most disturbing experiences for students is the turnover of instructional staff during a course, resulting in a loss of essential continuity. Excessive staff instability should be avoided if at all possible.

Weights

1. Is teaching competence (no matter how evaluated) included as one criterion in the formal salary and/or tenure and/or rank review policies of your institution? Mark one response.

No	Yes	
[6]	[0]	[0] This institution has no institution-wide salary/tenure/rank review policies. These decisions are left solely to the discretion of the individual departments or other academic programs (N/A).

1._____

2. Is teaching competence systematically evaluated by the following groups at your institution? Mark one response for each lettered item.

No	Yes		Weights
[2]	[0]	a. By administrative staff of the same department or program.	2a._____
[2]	[0]	b. By other instructional staff of the same department or program.	b._____
[4]	[0]	c. By students.	c._____
[1]	[0]	d. By graduates of this institution.	d._____
[1]	[0]	e. By instructional staff self-ratings.	e._____

If you filled in "No" to "By students" in item 2 above, skip the following two items and go on to item 5.

3. Are student evaluations of instructional staff members conducted on a regular basis (for example, yearly, at the end of each course, etc.)? Mark one response.

No	Yes	Weights
[2]	[0]	3._____

Weights

If you filled in "No" to item 3 above, skip the following item and go on to item 5.

4. Does the system of evaluation of instructors by students include the following provisions? Mark one response for each lettered item.

No	Yes			Weights
[1]	[0]		a. Anonymous student responding.	4a.____
[1]	[0]		b. Objective student responding (for example, on machine scored answer sheets).	b.____
[1]	[0]		c. Evaluations of all regularly appointed faculty members.	c.____
			There are no adjunct faculty members (N/A).	
[1]	[0]	[0]	d. Evaluations of all adjunct faculty members (for example, temporary appointments).	d.____

5. During the previous calendar year, how often did an unscheduled, permanent change of instructor occur after instruction had begun (for reasons other than illness or death of the original instructor)? Fill in the number; if none, enter as zero.
Number of times: ____

6. The number in item 5 above represented what percentage of the total number of instructors teaching during that calendar year? Mark one response; if none, enter as zero.

- [0] Zero.
- [0] Less than one percent.
- [2] One to two percent.
- [4] Three to five percent.
- [6] Six or more percent.

6.____

7. During the previous calendar year, did any unscheduled, permanent change of instructor occur in the same course or subject area twice or more often after instruction had begun? Mark one response.

No	Yes	
[0]	[4]	7.____

Total of Topic V Weights

VI. RECORDKEEPING PRACTICES

Rationale for this topic: Institutions which do not maintain accessible student records make it extremely difficult for current and former students to obtain them when needed. Moreover, if an institution closes, lack of a record maintenance policy can cause great inconvenience and even abuse of current and former students.

1. Are individual student records maintained which contain the following items? Mark one response for each lettered item.

No	Yes			Weights
			No fees are charged by this institution (N/A).	
[2]	[0]	[0]	a. Total fees paid by the student.	1a.____
[2]	[0]		b. Courses taken and completed or subject matter covered by the student.	b.____
			No internships or supervised practice are offered by this institution (N/A).	
[2]	[0]	[0]	c. Internships or other forms of supervised professional practice.	c.____
[2]	[0]		d. Academic credits, grades, or indicators of satisfactory progress earned by the student.	d.____
			No financial aid is offered by this institution directly (N/A).	
[2]	[0]	[0]	e. Financial aid awards, including loans, received by the student directly from the institution.	e.____
[2]	[0]	[0]	f. Bases for demonstration of: (a) student's eligibility for financial aid and (b) calculation of award.	f.____
[2]	[0]	[0]	g. Identification of officers who determined each student's eligibility and calculated his/her award.	g.____

2. Does this institution have a written policy for maintaining, or arranging for maintenance of, individual student access to records for a period of at least five years in the event of the institution's closure or change in ownership? Mark one response.

No	Yes	Weights
[4]	[0]	2.____

Total of Topic VI Weights

VII.

OCCUPATIONAL/PROFESSIONAL PREPARATION PROGRAMS

Rationale for this topic: There is no intent in this section to directly gauge the quality of an institution's instructional program. The intent is rather to gather descriptive indicators of practices which are viewed as essential for the maintenance and improvement of quality. In the occupational/professional preparation program area, students (and employers) generally expect training to result in certain specific outcomes, particularly in terms of qualifications and abilities necessary to enter a given occupational field. If the institution does <u>not</u> take definite steps to see that these outcomes are achieved by its graduates, it is in danger of malpractice. Although there is no <u>definitive</u> catalog of such steps, practices about which there is consensus are noted below. <u>Omit this section if your institution has no occupational/professional preparation programs.</u>

Weights

Rationale for items 1 and 2: Institutions lacking advisory bodies tend to insulate themselves and their curricula from current practices and technology in business, industry, and government, and in so doing they jeopardize the chances of their students for placement in jobs appropriate to the training.

1. Does your institution maintain and utilize advisory committee(s) on curriculum content and equipment? Mark <u>one</u> response.

   [6] No.

   [2] For <u>some</u> of the occupational/professional preparation program areas offered at this institution.

   [0] For <u>all</u> occupational/professional preparation program areas offered at this institution.

1. _____

If you filled in "No" to item 1 above, skip item 2 and go on to item 3.

Weights

2. Do these committee(s) include representatives of potential employers? Mark one response.

[4] No.

[2] For some of the occupational/professional preparation program areas offered at this institution.

[0] For all occupational/professional preparation program areas offered at this institution.

2._____

3. Do all of the occupational/professional preparation programs in your institution possess specialized/professional accreditation, if it is a requirement for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] Specialized/professional accreditation is not required for any position in any occupation or profession for which this institution provides preparation (N/A).

3._____

4. Do all of the occupational/professional preparation programs in your institution provide training in the use of basic tools and equipment, if it is a requirement for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] Training in the use of basic tools and equipment is not required for any position in any occupation or profession for which this institution provides preparation (N/A).

4._____

5. Do all of the occupational/professional preparation programs in your institution provide for internships and/or supervised practice on the job, if they are required for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] Internships and/or supervised practice on the job are not required for any position in any occupation or profession for which this institution provides preparation (N/A).

5._____

Weights

6. Do all of the occupational/professional preparation programs in your institution provide for internships and/or supervised practice in simulated job situations, if they are required for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] Internships and/or supervised practice in simulated job situations are not required for any position in any occupation or profession for which this institution provides preparation (N/A).

6._____

7. Do all of the occupational/professional preparation programs in your institution provide for instruction on topics necessary for State or professional certification in this State, if certification is a requirement for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] State or professional certification in this State is not required for any position in any occupation or profession for which this institution provides preparation (N/A).

7._____

8. Does your institution require reviews of the relevance and timeliness of all of its occupational/professional preparation curricula and instructional equipment at least once every two years? Mark one response.

No	Yes
[4]	[0]

8._____

Total of Topic VII Weights.

VIII. CAREER PLANNING AND PLACEMENT SERVICES AND FOLLOW-UP OF GRADUATES

Rationale for this topic: Two related topics are actually covered here. If institutions do not claim to offer career planning and placement service or assistance, it is of course not mandatory that they do so. If such assistance is offered, it should consist of certain essential services. Regardless of whether or not placement assistance is offered, follow-up of graduates and alumni is essential as a method for evaluating the relevance and effectiveness of an institution's educational program. Sampling and new follow-up techniques make such studies a possibility for all institution.

Weights

1. Does your institution state that it offers placement services or other assistance to students in finding jobs or planning careers? Mark one response.

   No Yes

   [9] [0]

1._____

If you filled in "No" to item 1 above, skip item 2 and go on to item 3.

Weights

Rationale for item 3: With the efficiency of modern sampling and follow-up techniques, even lack of a large budget is no reason for not trying to collect <u>some</u> data on employment success, the ultimate desired outcome of occupational and professional preparation programs.

3. Does your institution systematically collect data on the employment success (however defined) of persons in its occupational and/or professional preparation programs? Mark <u>one</u> response for each lettered item.

No	Yes	This institution currently has no occupational or professional preparation students or graduates (N/A).		Weights
[2]	[0]	[0]	a. Former students who did not graduate.	3a.____
[4]	[0]	[0]	b. Recent graduates (within one year of graduation).	b.____
[2]	[0]	[0]	c. Recent graduates (from one to five years of graduation).	c.____

4. Does your institution systematically collect data on the success of its graduates in obtaining admission to graduate or professional training programs? Mark <u>one</u> response.

No	Yes	This institution currently prepares no students for graduate or professional training.	Weights
[2]	[0]	[0]	4.____

5. Does your institution systematically collect data on the numbers and characteristics of students who drop out of the institution at the time they leave or soon thereafter? Mark <u>one</u> response.

		Weights
[4]	No, or only sporadically.	5.____
[2]	Yes, for all students enrolled in occupational and/or professional preparation programs or majors.	
[0]	Yes, for all enrolled students regardless of program or major.	

Total of Topic VIII Weights ____

Weights

Rationale for item 2: Genuine placement assistance or service performs at least the minimal functions of job placement (contacting prospective employers regarding possible openings), training in job-seeking and maintenance skills, and scheduling interviews for students, for both part-time and full-time jobs. Career planning assistance should include counseling, testing, and resources and activities designed to familiarize students and graduates with career and educational opportunities.

2. Does the career planning and placement assistance offered by your institution include the following aspects? Mark one response for each lettered item.

No	Yes		
[0]	[2]	a. A fee for the assistance.	2a.____
[2]	[0]	b. Professional counseling for career planning and choice.	b.____
[2]	[0]	c. Testing to facilitate personal assessment in relation to career opportunities.	c.____
[2]	[0]	d. A resource center which includes information on various career opportunities and educational and training institutions and programs.	d.____
[2]	[0]	e. Formal training in job-seeking and job-holding skills.	e.____
[2]	[0]	f. Seeking out and contacting prospective employers about potential job openings.	f.____
[2]	[0]	g. Making job interview appointments for individual students.	g.____
[0]	[2]	h. Referral to a commercial placement service which charges a fee.	h.____
[2]	[0]	i. Assistance in finding a part-time job.	i.____

Weights

Rationale for item 3: With the efficiency of modern sampling and follow-up techniques, even lack of a large budget is no reason for not trying to collect <u>some</u> data on employment success, the ultimate desired outcome of occupational and professional preparation programs.

3. Does your institution systematically collect data on the employment success (however defined) of persons in its occupational and/or professional preparation programs? Mark <u>one</u> response for each lettered item.

No	Yes	This institution currently has no occupational or professional preparation students or graduates (N/A).		Weights
[2]	[0]	[0]	a. Former students who did not graduate.	3a.____
[4]	[0]	[0]	b. Recent graduates (within one year of graduation).	b.____
[2]	[0]	[0]	c. Recent graduates (from one to five years of graduation).	c.____

4. Does your institution systematically collect data on the success of its graduates in obtaining admission to graduate or professional training programs? Mark <u>one</u> response.

No	Yes	This institution currently prepares no students for graduate or professional training.	Weights
[2]	[0]	[0]	4.____

5. Does your institution systematically collect data on the numbers and characteristics of students who drop out of the institution at the time they leave or soon thereafter? Mark <u>one</u> response.

		Weights
[4]	No, or only sporadically.	5.____
[2]	Yes, for all students enrolled in occupational and/or professional preparation programs or majors.	
[0]	Yes, for all enrolled students regardless of program or major.	

Total of Topic VIII Weights

IX. FINANCIAL STABILITY

Rationale for this topic: It is very difficult to either measure or guard against financial instability in a postsecondary institution, as many regulatory bodies have discovered too late. However, certain practices are more likely than others to ensure that institutions do not close, leaving students with no way to obtain either the instruction they paid for or a refund.

Weights

1. Is this a publicly-supported institution (that is, receives over 50% public funding)? Mark <u>one</u> response.

No	Yes		
[0]	[0]		1.____

If you filled in "Yes" to item 1 above, skip the following four items and go on to the Additional Comments page.

2. Are the central financial records and reports of your institution regularly audited or inspected as follows? Mark <u>one</u> response for each lettered item.

No	Yes		
[0]	[0]	a. <u>Uncertified</u> audit by an accounting firm.	2a.____
[4]	[0]	b. <u>Certified</u> audit by an accounting firm.	b.____
[2]	[0]	c. Inspection by a <u>State</u> regulatory or auditing agency.	c.____
[2]	[0]	d. Inspection by a <u>Federal</u> regulatory or auditing agency.	d.____

3. Does your institution have a retained earnings fund, an endowment, or other reserve of funds or source of income to pay operating expenses not covered by current student tuition receipts? Mark <u>one</u> response.

No	Yes	
[4]	[0]	3.____

Weights

4. Do the financial reporting practices of this institution report unearned tuition as assets, without indicating an offsetting liability? Mark one response.

No Yes

[0] [4]

4._____

5. Does your institution have debts or other outstanding repayment obligations exceeding $50,000 which are more than 90 days delinquent? Mark one response.

No Yes

[0] [4]

5._____

Total of Topic IX Weights

ADDITIONAL COMMENTS

Please write additional comments in the space below. If you are commenting on specific items, be sure to include the section and item number.

Section and Item Number	Comment

General Comments

SCORE SHEET

Both topic scores and overall institution scores can be computed on this page. To computer a topic score:

1. Write down the sum of weights recorded at the end of each topic.
2. Divide each sum by the number of items answered in that topic. Each number listed in the weights column (including zeros) represents an item. Multiply each quotient by 500. This is the topic score.

To compute your overall institution score:

1. Add all nine sums of weights.
2. Divide this sum by the total number of items answered.
3. Multiply this quotient by 500. This is your overall score.

The form below can be used to make these computations.

Topic Scores

Topic	(Sum of Weights ÷ Items Answered)	x 500 =	Topic Score
I	___		___
II	___		___
III	___		___
IV	___		___
V	___		___
VI	___		___
VII	___		___
VIII	___		___
IX	___		___

Overall Score

(Sum of All Weights)	÷	(Total Number of Items Answered)	x 500 =	Overall Institution Score
___		___	x 500 =	___

VIII. CAREER PLANNING AND PLACEMENT SERVICES AND FOLLOW-UP OF GRADUATES

Rationale for this topic: Two related topics are actually covered here. If institutions do not claim to offer career planning and placement service or assistance, it is of course not mandatory that they do so. If such assistance is offered, it should consist of certain essential services. Regardless of whether or not placement assistance is offered, follow-up of graduates and alumni is essential as a method for evaluating the relevance and effectiveness of an institution's educational program. Sampling and new follow-up techniques make such studies a possibility for all institution.

Weights

1. Does your institution state that it offers placement services or other assistance to students in finding jobs or planning careers? Mark one response.

   No Yes

   [0] [0]

1.____

If you filled in "No" to item 1 above, skip item 2 and go on to item 3.

Weights

2. Do these committee(s) include representatives of potential employers? Mark one response.

[4] No.

[2] For some of the occupational/professional preparation program areas offered at this institution.

[0] For all occupational/professional preparation program areas offered at this institution.

2._____

3. Do all of the occupational/professional preparation programs in your institution possess specialized/professional accreditation, if it is a requirement for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] Specialized/professional accreditation is not required for any position in any occupation or profession for which this institution provides preparation (N/A).

3._____

4. Do all of the occupational/professional preparation programs in your institution provide training in the use of basic tools and equipment, if it is a requirement for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] Training in the use of basic tools and equipment is not required for any position in any occupation or profession for which this institution provides preparation (N/A).

4._____

5. Do all of the occupational/professional preparation programs in your institution provide for internships and/or supervised practice on the job, if they are required for the employment of graduates in those occupations or professions? Mark one response.

No	Yes	
[4]	[0]	[0] Internships and/or supervised practice on the job are not required for any position in any occupation or profession for which this institution provides preparation (N/A).

5._____

Weights

If you filled in "No" to item 2 above, skip the following two items and go on to the next section, Instructional Staff Evaluation and Stability.

3. How is the written refund policy made available to students? Mark one response for each lettered item.

No	Yes		Weights
[2]	[0]	a. It is made available for public inspection at the institution.	3a.____
[2]	[0]	b. It is printed in the institution's general catalog or bulletin.	b.____
[4]	[0]	c. It is distributed to all enrolled students (free or at a cost not exceeding $2).	c.____
[4]	[0]	d. It is distributed to all prospective students (free or at a cost not exceeding $2).	d.____

Rationale for item 4: There are aspects of a refund policy which are desirable for all institutions which collect fees in advance. Students need to know when they qualify for a refund and how they must apply for it. Also, students should be able to assume that institutions will process valid refund requests within a reasonable period of time. Institutions should avoid large nonrefundable application or processing fees, and should never assess such fees without ample advance notice to students.

4. Does your institution's written refund policy clearly specify the following items? Mark one response for each lettered item.

No	Yes			Weights
[4]	[0]		a. Those fees and charges which are not refundable.	4a.____
[2]	[0]		b. All conditions which students must meet to obtain refunds.	b.____
[4]	[0]		c. How to properly apply for a refund.	c.____
			This institution collects no tuition in advance (N/A).	
[2]	[0]	[0]	d. A tuition refund formula by which students pay only for the instruction made available to them.	d.____

No	Yes			Weights
[1]	[0]		h. Educational content of each course, or of the program if separate courses do not exist.	h.____
[1]	[0]		i. Number of hours of instruction in each course, or in the program if separate courses do not exist, and length of time in hours, weeks, or months normally required for its completion.	i.____
[1]	[0]		j. An accurate listing of instructional staff who currently teach.	j.____
			No such distinction exists (N/A).	
[1]	[0]	[0]	k. An indication of the distinction between adjunct or part-time faculty and full-time faculty.	k.____
[1]	[0]		l. Policies and procedures regarding acceptability or non-acceptability of credits <u>from</u> other institutions.	l.____
[1]	[0]		m. General acceptability or non-acceptability <u>by</u> other institutions of credits earned at this institution.	m.____
[2]	[0]		n. Requirements for graduation.	n.____
[1]	[0]		o. Statement of certificates or diplomas awarded upon graduation.	o.____
[1]	[0]		p. Statement of degrees awarded upon graduation.	p.____
[1]	[0]		q. Data regarding numbers and characteristics of students who drop out of this institution before their graduation.	q.____
			This institution has no undergraduate occupational/professional preparation programs (N/A).	
[2]	[0]	[0]	r. Data regarding the employment success of students who graduate from this institution's undergraduate occupational/professional preparation programs.	r.____
			This institution has no graduate occupational/professional preparation programs (N/A).	
[2]	[0]	[0]	s. Data regarding the employment success of students who graduate from this institution's graduate occupational/professional preparation program.	s.____
[1]	[0]		t. Grading system.	t.____
			Policies and rules relating to:	
[1]	[0]		u. Excessive late-arrival for classes.	u.____
[1]	[0]		v. Absences.	v.____
[1]	[0]		w. Make-up work.	w.____
[1]	[0]		x. Student conduct.	x.____
[1]	[0]		y. Termination/withdrawal.	y.____
[1]	[0]		z. Re-entry after termination/withdrawal.	z.____

SCORE SHEET

Both topic scores and overall institution scores can be computed on this page. To computer a topic score:

1. Write down the sum of weights recorded at the end of each topic.
2. Divide each sum by the number of items answered in that topic. Each number listed in the weights column (including zeros) represents an item. Multiply each quotient by 500. This is the topic score.

To compute your overall institution score:

1. Add all nine sums of weights.
2. Divide this sum by the total number of items answered.
3. Multiply this quotient by 500. This is your overall score.

The form below can be used to make these computations.

Topic Scores

Topic	(Sum of Weights ÷	Items Answered)	x 500 =	Topic Score
I	___	___		___
II	___	___		___
III	___	___		___
IV	___	___		___
V	___	___		___
VI	___	___		___
VII	___	___		___
VIII	___	___		___
IX	___	___		___

Overall Score

(Sum of All Weights)	÷	(Total Number of Items Answered)	x 500 =	Overall Institution Score
___		___	x 500 =	___

AUGUST 1977

APPENDIX B

USER GUIDE

FOR

INSTITUTIONAL SELF-STUDY FORM

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PURPOSE

Accreditation has a long and unique history as a process for improving the quality of educational institutions and programs. The essential components of the accreditation process are self-study and peer review conducted in an atmosphere of healthy criticism. Recently, institutions of postsecondary education have come under increasing pressure to provide their students with better protection from potentially abusive conditions and practices which can: (1) mislead students by creating higher expectations than are warranted; (2) endanger students' opportunity to receive the educational services which they have purchased, either directly or indirectly through public or private support; or (3) deny students proper recourse in cases where they have been misled or denied opportunities. In an extensive two-year study of ways to improve educational consumer protection (see Jung et al., 1977), staff of the American Institutes for Research (AIR) concluded that the accreditation process, in addition to its quality improvement function, held potential for helping institutions do a better job of detecting and eliminating conditions and practices which are potentially abusive to students. The effort currently underway is experimenting with a mechanism which it is hoped will convert this potential to a reality. The purpose of this guide is thus to introduce an Institutional Self-Study Form (ISSF) and then to suggest some possible ways in which the form might be used in the accreditation process. Uses are suggested for both institutional self-study and peer/review/verification by visiting representatives of accreditation agencies.

BACKGROUND

In order to adequately suggest ways to influence potential for student abuse, it was first necessary to be able to define the nature of student abuse. AIR staff undertook a comprehensive search of the literature, which included: (1) the records of hearings conducted by subcommittees of the U.S. House of Representatives Committee on Education and Labor and Committee on Government Operations; (2) reports published by the Education Commission of the States as a result of two national conferences on student consumer protection; (3) a report published by the U.S. Office of Education (USOE) as a result of a national conference on institutional eligibility for federal student assistance programs; (4) the 40+ volume file put together by the staff of the Federal Trade Commission in support of their proposed trade regulation rule for proprietary vocational and home study schools; (5) the student complaint files of USOE's Accreditation and Institutional Eligibility Staff (now the Division of Eligibility and Agency Evaluation); and over 60 other sources (see Helliwell & Jung, 1975). In general, the attempt was to identify institutional policies and practices which had demonstrably misled students and frustrated their efforts to obtain an education. Several decisions were made which should be made explicit here.

> Students are consumers. Some authors (e.g., Enteman, 1975) have attempted to contend that students, as participants in the educational process, are not "consumers" in the true sense of the word. While AIR staff believed that a good deal of the responsbility for learning during any educational experience rests with the student, it is clear that some school practices deprive the student of even an opportunity to learn; furthermore, some practices are so blatantly unfair that they would be abusive regardless of the product or service that was being offered. To the extent that institutions do market an educational service, students are clearly the consumers.

Consumer protection is not the same as better educational decision making. Numerous calls have been registered for systems to assist students in making better decisions about postsecondary education. Such calls usually include requests for disclosure of better information on the course options, social climate, financial aid, and so on, available at an institution, plus providing students with an insight into the world of work and the student's own goals, interests, and abilities. Information of this type is no doubt an aid to student decision making. However, such information is not the same as information about institutional practices which can abuse students. The limited set of information useful for providing better "student consumer protection" should be carefully distinguished from the much larger set required to facilitate "better student decision making;" this distinction can help avoid much unnecessary confusion and effort.

CATEGORIES OF ABUSE

Through an analysis of the conditions which led to well-documented abuses of students, AIR staff identified a set of institutional conditions and practices that seemed to have the highest potential for abuse. In this analysis, they took into account the fact that postsecondary students are quite capable of excessive subjectivity, deception, and of making unfair complaints which are not the result of institutional causes. The types of valid potentially abusive conditions and practices that were identified are listed in Table 1.

Table 1

TYPES OF POTENTIALLY ABUSIVE INSTITUTIONAL CONDITIONS AND PRACTICES

1. Misleading recruiting and lax admissions policies and practices.
2. Lack of necessary disclosure in written documents.
3. Misrepresentation and misuse of approved and accredited status.
4. Inequitable tuition and fee refund policies and failure to make timely refunds.

5. Lack of adequate procedures to ensure qualified and stable instructional staff.

6. Inadequate recordkeeping practices.

7. Failure to maintain up-to-date and relevant instructional programs, especially in occupational/professional preparation programs.

8. Lack of adequate job placement services (if promised), and lack of follow-up of former students.

9. Financial instability.

The types of potential abuses listed in Table 1 are further expanded in Appendix A. It should be noted that all of the potential abuses detailed in Appendix A are stated negatively--in other words, they are stated as aspects of an institution that, if present, will increase the probability that student abuse may occur. The converse of the conditions and practices listed in Appendix A provides an indication of institutional conditions and practices which provide improved educational consumer protection. These are listed in Appendix B.

Note that the measure under investigation is "potential for abuse," not actual abuse. No attempt is being made to directly gauge actual student abuse. The pointing of accusatory fingers at allegedly guilty parties does little to work toward constructive improvement. It is hoped that the identification and quantification of institutional policies and practices related to student consumer abuse <u>will</u> lead to such improvement.

The presence of one or more potentially abusive conditions or practices does <u>not</u> automatically indicate that student abuse is occurring or will occur in the future at an institution. In fact, in a survey of 37 institutions conducted by AIR staff in early 1976, none was completely free from potential for abuse. Moreover, some conditions and practices hold considerably less potential for abuse than others. But the more conditions and practices

listed in Appendix A that are found to be present, and the more serious they are, the greater the probability that actual abuses will occur. All, however, are modifiable and within the power of an institution to modify without excessive cost.

INSTITUTIONAL SELF-STUDY FORM

An Institutional Self-Study Form (ISSF) has been developed by AIR to provide a convenient yet reliable mechanism for detecting the presence of potential abuses and quantifying the seriousness of those that are revealed. The ISSF is a self-scoring questionnaire suitable for use by any person or group that is knowledgeable about an institution. Its completion requires examination of certain institutional policy statements, records, recruiting and disclosure materials, and other procedures and practices. All of the items on the ISSF are in an objective, multiple-choice format; they are grouped into nine topics in accordance with the nine types of potential abuses listed in Table 1. Each topic and many items are accompanied by brief statements that describe their underlying rationales. Each item response option has an associated weight that indicates the perceived seriousness of the response. These item weights can be summed and averaged to provide scores for each of the nine topics and the overall ISSF. The higher these scores, the greater the revealed potential for abuse. A perfect score (no revealed potentials) would be zero. Again, however, no institution is expected to be totally free from potential for abuse, and zero scores are unlikely.

The ISSF has certain limitations which should be made explicit.

> Campus-based programs. The ISSF has been designed to detect potential abuse areas primarily in campus-based programs. It has not been validated as a mechanism for detecting problems in non-traditional, off-campus, extension, or correspondence programs or institutions.

Undergraduate emphasis. The primary emphasis of the ISSF is on undergraduate programs, especially those which stress occupational and professional preparation for undergraduates. It has not been validated for postgraduate or professional education programs.

The ISSF should not be used in connection with programs that have other than a campus-based, undergraduate orientation.

POSSIBLE ISSF USES IN THE ACCREDITATION PROCESS

The primary intended uses of the ISSF in the accreditation process are in connection with the institutional self-study and the site-visit review and self-study verification.

For the self-study, the primary use is to make an internal assessment of existing conditions and practices that are potentially abusive to students, with the purpose of eliminating or revising those revealed. There are several possible variations that might be considered in conducting the assessment.

Administrative review. Most of the information required to complete the ISSF is or should be available to institutional administrators. It is therefore a relatively easy matter for an administrative staff member to collect the necessary information and complete an ISSF which will then represent the most accurate estimate of the conditions and practices existing at the institution. In larger institutions and those where individual departments have a good deal of autonomy in setting policies, the task of completing an ISSF may be more difficult. In any case, the administrative ISSF could represent one major part of the entire self-study process preparatory to initial consideration for accreditation or reaccreditation. It or a summary of its findings might be inserted into the self-study document submitted to the accreditation agency.

Other perspectives. Sometimes having the most accurate estimate of a condition or practice is of less importance than knowing how the condition or practice is perceived by individuals or groups who may be affected by it. This is especially true with regard to potential abuses. If a protective policy exists, but is unknown or unrecognized by those whom it is supposed to protect, it is only serving part of its function. For this reason, it may be useful to obtain ISSF data from groups at an institution that may have perspectives different from the administration. Such groups would especially include faculty, students, and perhaps alumni. They could also include administrators at branch campuses or representatives of different offices within the central administration. As an integral part of their participation in the self-study, representatives of these groups could be asked to complete and submit ISSF's. These, or their summaries, might also be inserted into the self-study document.

The wider the range of groups represented in the self-study assessment of consumer protection adequacy and the more intensive their involvement, the more likely it is that potential problems will be revealed and possible solutions can be cooperatively instituted.

The main purpose of the site-visit team with regard to the ISSF will be to verify the findings and actions derived from the ISSF and reported in the self-study. Multiple groups and perspectives will be sampled in carrying out this verification. It is not likely that ISSF data, as verified, will be used by the accreditation agency in making decisions regarding initial or continuing accreditation. However, a site-visit team's recommendations may very well be based on information derived from the ISSF.

WHERE TO FIND ISSF DATA

Most ISSF items are in the form "Does this institution have/do this?" The easiest way to complete an ISSF is to locate a person knowledgeable about

TABLE 2

Sources of Information for ISSF Completion

	Topic	Sources
I.	Student recruiting policies and practices	Admissions officer Admissions policy statements Institutional advertising
II.	Disclosure in written documents	General catalog, bulletin or other public information documents
III.	Representation of approved or accredited status	Public information officer Chief administrative officer Public information documents
IV.	Refund policies and practices	Chief financial affairs officer Public information documents
V.	Instructional staff evaluation and stability	Chief executive and/or academic affairs officer Department heads
VI.	Recordkeeping practices	Registrar Records office
VII.	Occupational/professional preparation programs	Chief academic affairs officer Department heads Chief administrative officers for occupational/professional preparation programs.
VIII.	Career planning and placement services and follow-up of graduates	Placement officer Director of institutional research services Public information documents Advertising
IX.	Financial stability	Chief executive officer Chief financial affairs officer Financial statement

each topic, ask the items, and record his/her responses. Complications arise when recollections are vague, policies are "usually" followed but exceptions are allowed, qualifications are required based on different or unusual circumstances, and so forth. The safest stance, and the one which will yield the most accurate data, is to obtain and review documentation or secondary verification for all items about which there is any question. Table 2 presents a listing of possible sources for each topic in the ISSF.

INTERPRETING ISSF SCORES

Table 3 shows the maximum (worst-possible) score for each topic score and the institution score derived from the ISSF. Since the best possible scores are zero, all scores may range from zero up to the maximums indicated. Table 3 also contains the range of scores expected to be obtained by a cross section of institutions, based on past tests of the report form. These scores provide a limited perspective from which to make judgments about the magnitude of scores obtained during your self-study and verification. Obtained scores toward the upper end of these ranges call for careful investigation by examination of each of the component items to determine whether revisions in conditions and/or policies might be called for to provide better protection for students. Of course, any score above zero provides room and suggestions for improvement.

Table 3

MAXIMUM POSSIBLE ISSF SCORES AND SCORE RANGES
EXPECTED FROM A CROSS SECTION OF INSTITUTIONS

Topic	Weighted Items	Maximum Score	Expected Range
I	18	1,560	100-400
II	38	780	50-250
III	6	1,330	0-500
IV	11	1,125	100-400
V	13	1,075	100-500
VI	8	1,125	125-500
VII	9	2,140	250-750
VIII	14	1,140	100-500
IX	7	1,250	0-400
Institution	123	1,140	100-300

APPENDIX A

Categories and Examples of Potentially Abusive Institutional Policies and Practices

A. Refund Policies and Practices

1. Institution does not have a written refund policy for fees or charges collected or obligated in advance of enrollment or class attendance.

2. Written refund policy is not publicly disseminated to students and prospective students.

3. Written refund policy does not tell students how to obtain refunds.

4. Written refund policy does not provide for at least partial return of student fees or charges based on the amount of instruction the student has had the opportunity to receive.

5. Written refund policy does not specify the maximum time allowed between the receipt of a valid refund request and the issuance of a refund.

B. Advertising Practices

1. Institution uses:

   (a) advertisements in "help wanted" section of newspapers, pseudo "Talent" contests;

   (b) testimonials or endorsements by actors who did not attend the institution; or

   (c) limited time "discounts," to attract enrollees.

2. Advertising of the institution guarantees or implies that completion of an education or training program will lead to employment.

3. Institution's advertising implies that it:

   (a) has special ties or connections with employers which it does not in fact have;

   (b) offers full or partial scholarships when in fact it offers only loans or deferred tuition;

   (c) has recognized experts on its teaching faculty who in fact have no teaching responsibilities; or

   (d) offers a "superior" educational program when in fact there is no comparative evidence to support the assertion.

C. Admission Practices

1. Institution employs admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

2. Institution does not have a written policy governing recruiting and/or admission practices.

3. Written recruiting/admissions policy does not contain:

   (a) any prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

   (b) a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; or

   (c) a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

4. Institution does not provide remedial instruction in basic skills for students who are admitted without meeting stated admissions requirements.

D. Instructional Staff Evaluation Policies

1. Teaching competence is not included as one criterion in formal salary and/or tenure and/or rank review policies.

2. Evaluations of teaching competence do not include regular, anonymous ratings by students.

E. Disclosure in Written Documents

1. Failure to disclose any of the following in a general catalog, bulletin, or other basic information document:

   (a) name and address of school.

   (b) date of publication of the document.

   (c) school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

   (d) a statement of institutional philosophy.

   (e) a brief description of the school's physical facilities.

   (f) an accurate list of all courses actually offered.

   (g) an indication of when specific required courses will <u>not</u> be offered.

   (h) educational content of each course.

   (i) number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

(j) an accurate listing of faculty who currently teach.

(k) an indication of the distinction between adjunct or part-time faculty and full-time faculty.

(l) policies and procedures regarding acceptability of credits from other institutions.

(m) general acceptability by other institutions of credits earned at this institution.

(n) requirements for graduation.

(o) statement of certificates, diplomas, or degrees awarded upon graduation.

(p) statement of all charges for which a student may be held responsible.

(q) financial aid programs actually available to students.

(r) limitations on eligibility for financial aid programs.

(s) grading system.

(t) policies relating to:

(1) tardiness
(2) absences
(3) make-up work
(4) student conduct
(5) termination
(6) re-entry after termination

(u) student fee increases in excess of $25 that are planned within the next year.

(v) for student loan applicants:

(1) the effective annual loan interest rate
(2) loan repayment obligations
(3) loan repayment procedures
(4) time allowed for repayment
(5) deferment or cancellation provisions, if any
(6) collection procedures which might be applied in the event of failure to repay

2. In the event any of the following services or facilities are provided, failure to disclose their actual availability and extent:

(a) Job placement assistance or service.

(b) counseling, including for employment, academic, and/or personal problems.

(c) dining facilities.

(d) housing facilities.

(e) student parking facilities.

3. In the event the institution offers an educational program which leads to the award of degrees (or which results in credits which are transferable toward the award of degrees), failure to provide accurate descriptions of:

   (a) recognition by a state agency as meeting established educational standards for granting degrees, if there is such an agency;

   (b) the scope and sequence of required courses or subject areas in each degree program; and

   (c) policies and procedures which students must follow to transfer credits within the institution and/or to other institutions.

F. Student Orientation Procedures

1. The institution does not conduct a formal orientation program for newly enrolled students.

2. Failure to include in this orientation the following:

   (a) oral presentations or written documents prepared by students who have been previously enrolled at the institution.

   (b) instructions on how and where to voice student complaints and grievances.

   (c) information on how and where to apply for student financial aid.

G. Job Placement Services and Follow-Through

1. In the event the institution claims to have a job placement service, this service does <u>not</u> include the following aspects:

   (a) notification of fee charged, if this is the case.

   (b) formal training in job-seeking and job-holding skills.

   (c) contacting prospective employers to develop potential jobs.

   (d) making job interview appointments for individual students, including those seeking part-time employment and recent graduates.

2. In the event the institution claims to have a job placement service, the service is confined only to such services as distributing "Help wanted" ads from newspapers or referral to a commercial placement service.

3. The institution does not regularly collect follow-up data on the employment success of former students who did not graduate, recent graduates, and/or longer term graduates.

4. Institution does not annually calculate the rates of student attrition from each identifiable program or curriculum area and does not attempt to determine the reasons for this attrition.

H. Recordkeeping Practices

1. The institution does not maintain the following items in its individual student records:

   (a) total fees paid by the student.

   (b) courses taken and completed.

   (c) academic credits, grades earned.

   (d) financial aid amounts, including loans, if any, actually received by student and date of his/her receipt.

2. Institution does not have a written policy and actual procedures for maintaining individual student access to records for a period of at least two years following his/her departure from the institution, regardless of the operating status of the institution.

I. Turnover of Instructional Staff

1. Instructional staff are repeatedly replaced, in the same sections/courses, after instruction has begun.

2. Instructional staff are replaced in two or more sections/courses after instruction has begun.

J. Representation of Chartered, Approved, or Accredited Status

1. The institution fails to disclose to students and prospective students the fact(s) of limitation(s) or sanction(s) for noncompliance with designated standards imposed by local, state, or federal government agencies, if any exist.

2. The public representations of the institution fail to distinguish between (e.g., list separately, with appropriate explanations) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state chartering and licensing, if any are present.

K. Financial Stability

1. If the institution is not publicly-supported, it does not have the following:

   (a) an endowment or retained earnings fund to pay current operating expenses if they are not covered by student tuition receipts.

   (b) a reserve of funds sufficient to pay out tuition refunds as students make legitimate requests for them.

2. The institution's financial records and reports are not annually subjected to a certified audit.

L. Instructional Programs in Occupational, Professional Preparation Areas

1. The institution does not maintain curriculum advisory committees which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not provide the following, when they are required for employment of graduates in an occupational/professional area:

   (a) specialized/professional program accreditation.

   (b) training in the use of basic tools and equipment.

   (c) internships and/or supervised practice on the job.

   (d) internships and/or supervised practice in simulated job situations.

   (e) instruction on topics necessary for state or professional certification of graduates.

3. The institution does not require a biannual review of the relevance and timeliness of occupational/professional curricula.

M. Instructional Equipment and Facilities in Occupational/Professional Preparation Areas

1. The institution does not maintain advisory committes on instructional equipment and facilities which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. The institution does not annually budget and expend funds for replacing worn or outdated instructional equipment in each occupational/professional area for which instruction is offered.

APPENDIX B

Categories and Examples of Institutional

Policies and Practices Which Promote Educational Consumer Protection

A. Refund Policies and Practices

1. Institution has a written refund policy for fees or charges collected or obligated in advance of enrollment or class attendance.

2. Written refund policy is publicly disseminated to students and prospective students.

3. Written refund policy tells students how to obtain refunds.

4. Written refund policy provides for at least a partial return of student fees or charges based on the amount of instruction the student has had the opportunity to receive.

5. Written refund policy specifies the maximum time allowed between the receipt of a valid refund request and the issuance of a refund.

B. Advertising Practices

1. Institution does not use:

(a) advertisements in "help wanted" section of newspaper or unselective "talent" contests to stimulate applications for enrollment;

(b) paid testimonials or endorsements by persons who did not attend the institution; or

(c) limited time "discounts," to attract enrollees.

2. Advertising of the institution does not guarantee or imply that completion of an education or training program at the institution will lead directly to employment.

3. Institution's advertising does not imply that it:

   (a) has special ties or connections with employers which it does not in fact have;

   (b) offers full or partial scholarships when in fact it offers only loans or deferred tuition;

   (c) has recognized experts on its teaching faculty who in fact have no teaching responsibilities; or

   (d) offers a "superior" educational program when in fact there is no comparative evidence to support the assertion.

C. Admission Practices

1. Institution does not employ admissions representatives whose compensation or salary is dependent wholly or in part on direct commissions based on number of students enrolled.

2. Institution has a written policy governing recruiting and/or admission practices.

3. Written recruiting/admissions policy contains:

   (a) total prohibitions against unethical practices such as the "bait and switch" or the "negative sell";

   (b) a requirement that all prospective students talk to a representative of the institution at the school prior to enrolling; and

   (c) a requirement that all enrollees sign an agreement which describes complete costs, payment requirements, and educational services to be provided by the institution.

4. Institution provides basic remedial instruction for students who are admitted without having met stated admissions requirements.

D. Instructional Staff Evaluation Policies

1. Teaching competence is included as one criterion in formal salary and/or tenure and/or rank review policies.

2. Evaluations of teaching competence include regular, anonymous, objective ratings by students.

E. Disclosure in Written Documents

1. Positive disclosure of the following items in a general catalog, bulletin, other basic information document, or combination of these:

   (a) name and address of school.

   (b) date of publication of the document.

   (c) school calendar including beginning and ending dates of classes and programs, holidays, and other dates of importance.

(d) statement of institutional philosophy, including the educational objectives of any occupational programs offered by the institution.

(e) accurate description of the school's physical facilities.

(f) accurate list of all courses which are actually offered.

(g) indication of when specific, required courses will not be offered.

(h) educational content of each course.

(i) number of hours of instruction in each course and length of time in hours, weeks or months normally required for its completion.

(j) accurate listing of faculty who currently teach.

(k) indication of the distinction between adjunct or part-time faculty and full-time faculty.

(l) policies and procedures regarding acceptability of credits from other institutions.

(m) general acceptability by other institutions of credits earned at this institution.

(n) requirements for graduation.

(o) statement of certificates, diplomas, or degrees awarded upon graduation.

(p) statement of all charges for which a student may be held responsible.

(q) financial aid programs actually available to students.

(r) any standard limitations on eligibility for financial aid programs.

(s) grading system.

(t) policies relating to:

(1) tardiness
(2) absences
(3) make-up work
(4) student conduct
(5) termination
(6) re-entry after termination

(u) any student fee increases in excess of $25 that are planned within the next year

(v) for student loan applicants:

(1) the effective annual loan interest rate
(2) loan repayment obligations
(3) loan repayment procedures
(4) time allowed for repayment
(5) deferment or cancellation provisions, if any
(6) collection procedures which might be applied in the event of failure to repay

2. In the event any of the following services or facilities are provided, the institution discloses their actual availability and extent:

   (a) job placement assistance or service.

   (b) counseling, including for employment, academic, and/or personal problems.

   (c) dining facilities.

   (d) housing facilities.

   (e) student parking facilities.

3. In the event the institution offers an educational program which leads to the award of degrees (or which results in credits which are transferable toward the award of degree), it provides accurate descriptions of:

   (a) recognition by a state agency as meeting established educational standards for granting degrees, if there is such an agency;

   (b) the scope and sequence of required courses or subject areas in each degree program; and

   (c) policies and procedures which students must follow to transfer credits within the institution and/or to other institutions.

F. Student Orientation Procedures

1. Institution does conduct a formal orientation program for newly enrolled students.

2. This formal orientation includes at least the following:

   (a) oral presentations or written documents prepared by students who have been previously enrolled at the institution;

   (b) instructions on how and where to voice student complaints and grievances; and

   (c) information on how and where to apply for student financial aid.

G. Job Placement Services and Follow-Through

1. In the event the institution claims to have a job placement service, this service <u>does</u> include at least the following aspects:

   (a) notification of fee charged, if this is the case;

   (b) formal training and supervised practice in job-seeking and job-holding skills;

   (c) contacting prospective employers to develop potential jobs; and

   (d) making job interview appointments for individual students, including those seeking part-time employment and recent graduates.

2. In the event the institution claims to offer job placement assistance, the assistance is not confined only to such services as distributing "help wanted" ads from newspapers or referral to a commercial placement service.

3. Institution regularly collects follow-up data on the employment success of former students who did not graduate, recent graduates, and/or longer term graduates.

H. Recordkeeping Practices

1. Institution maintains the following items in its individual student records:

(a) total fees paid by student;

(b) courses taken and completed;

(c) academic credits, grades earned; and

(d) financial aid amounts granted through the institution, including loans, if any, actually received by student and date of his/her receipt.

2. Institution has a written policy and actual procedures for maintaining individual student access to records for a period of at least two years following his/her departure from the institution, regardless of the operating status of the institution.

I. Turnover of Instructional Staff

1. Every effort is made to avoid replacement of instructors for the same sections/courses, after instruction has begun.

J. Representation of Chartered, Approved, or Accredited Status

1. Institution discloses to students and prospective students the fact(s) of limitation(s) or sanction(s) for noncompliance with designated standards imposed by local, state, or federal government agencies, if any such sanctions exist.

2. The public representations of the institution distinguish between (e.g., list separately, with appropriate explanations) institutional accreditation, specialized or professional program accreditation, state VA-approving agency course approval, and state chartering and licensing, if any are present.

K. Financial Stability

1. If the institution is not publicly-supported, it has the following:

(a) an endowment or retained earnings fund to pay current operating expenses if they are not covered by student tuition receipts; and

(b) a reserve of funds sufficient to pay out tuition refunds as students make legitimate requests for them.

2. Institution's financial records and reports are annually subjected to a certified audit.

L. Instructional Programs in Occupational, Professional Preparation Areas

1. Institution maintains and periodically empanels curriculum advisory committees which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. Institution provides the following, when they are required for employment of graduates in an occupational/professional area:

(a) specialized/professional program accreditation.

(b) training in the use of basic tools and equipment.

(c) internships and/or supervised practice on the job.

(d) internships and/or supervised practice in simulated job situations.

(e) instruction on topics necessary for state or professional certification or licensing of graduates.

3. Institution requires at least a biannual review of the relevance and timeliness of occupational/professional curricula.

M. Instructional Equipment and Facilities in Occupational/Professional Preparation Areas

1. Institution maintains and periodically empanels advisory committees on instructional equipment and facilities which include representatives of potential employers in each occupational/professional area for which instruction is offered.

2. Institution annually budgets and expends funds for replacing worn or outdated instructional equipment in each occupational/professional area for which instruction is offered.

N. Attrition and Loan Default

1. Institution annually calculates the rates of student attrition from each identifiable program or curriculum area and accurately discloses these rates upon request.

2. If it is a participant in the National Direct Student Loan Program or is a lender in the Federally Insured Student Loan Program, the institution annually calculates the rate of default on its student loans.

April 1978

APPENDIX C

A Sample ISSF Report

AMERICAN INSTITUTES FOR RESEARCH SELF-STUDY

INSTITUTIONAL RESPONSE

With the exception of a low extreme and a high extreme, respondents' overall institutional scores, as given, indicated a range that uniformly clustered from 135-285. It appears that scores, in general, fell neither into the unusually low or unusually high levels (0-500). The mean was 216.05, the median 210, the mode 210. Naturally all areas are improvable, but Sections I, VIII, and IX show lack of full strength probably due less to breach of practice and more to lack of communication.

It can be concluded that our institution needs to make explicit in written form as to how a student can obtain refunds. The matter of admission representatives' compensation needs to be settled where in doubt; enrollee agreements need to be considered; the faculty needs to realistically come to grips with student ratings of teacher competence; and typical collegiate cash-flow trauma requires sympathy and patience from the public.

This institutional summarization based on substantive data-information and expressed by the undersigned constitutes a score of 230. It has been brought to my attention that the 1978-79 edition of the College Catalogue will include the academic calendar. The American Institute's survey, as part of self-study, accounts for several such up-dates in academic practice coming newly into effect.

Director of the Extension Program and
Academic Vice-President

APPENDIX D

A Sample ISSF Report

SELF-STUDY OF THE POTENTIAL FOR STUDENT ABUSE
FOUND IN THE POLICIES OF ONE SCHOOL
INVOLVED IN THE ACCREDITATION FIELD TEST

January 1978

INTRODUCTION

As an additional portion of the self-study prepared by for the Association, the college agreed to use the survey materials constructed by the American Institutes for Research in order to measure the "potential for abuse of the student by the institution".

As a trial measurement, the campus of was selected as the target campus, and a sample of fifteen individuals was assembled. A meeting was held to acquaint the sample with the purpose of the survey and the procedures to be used. It was emphasized that the responses should be as emotion-free as possible, and that an accurate measurement of the sample was necessary to allow (1) a clear reading from the sample, and (2) a base from which to judge the validity of the instrument itself.

THE SAMPLE

Six administrators, four faculty professionals and five students self-administered the questionnaire. Selection of the sample was not random. The intention was to select individuals who knew a substantial amount about the college and its operations, in order that a high percentage of the topic items would be answered. However, no attempt to select individuals because of their predisposition toward policy was made. Every respondent was requested to give an open and direct response, and in case of indecision, to respond on the pessimistic side of the alternatives from which to select. These instructions were made to avoid any pro-college bias which would reduce the validity of the initial survey.

The Administrator Sample. Six administrators self-administered the instrument. The Chancellor, the Dean of Academic Affairs, the Director of Development, the Dean of Students, the Business Manager and the special assistant to the Chancellor participated. All but one of the administrators has been employed by for ten years or more. The mean length of service among the group was 10.33 years and the cumulative years of service was 62 years.

The Faculty Sample. Four faculty self-administered the instrument. Four senior faculty in the departments of Advertising, Accounting, General Business and English, all Associate Professors, were involved. The average length of service within the group was 7.25 years and the cumulative service was 29 years.

The Student Sample. Five students, two Juniors and three Seniors, self-administered the instrument. The students in the sample were selected on the basis of their knowledge of in several different areas, and they were able to respond to a large percentage of the questions.

THE DATA

The raw data (self-scored results) are given on the following two pages in two forms. THE DATA BASE presents the raw scores for each member of the sample by topic and subgroup (student, faculty, administrator). The DATA BASE GROUP MEANS presents the means for each subgroup (student, faculty, administrator) by topic, and allows comparison of the different subgroups in perspective. Also listed are the "national range" and the "possible high" scores as given by American Institutes for Research in their literature.

THE DATA BASE

SCORES OF INDIVIDUAL SAMPLE PARTICIPANTS IN NINE TOPIC AREAS

	Students					Faculty				Administrators						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	← Individuals in the sample
TOPIC I ADMISSIONS	312	263	312	111	111	53	308	220	56	368	167	313	50	833	375	
TOPIC II DISCLOSURE	78	39	13	71	44	66	135	55	14	51	0	26	405	0	132	
TOPIC III REP. OF ACCRED.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
TOPIC IV REFUND POLICY	125	62	125	0	500	250	0	0	188	188	0	250	125	1250	188	
TOPIC V EVALUATION-STAFF	375	115	125	31	0	115	0	35	83	115	0	39	35	286	142	
TOPIC VI RECORD KEEPING	142	0	0	0	0	0	0	125	0	0	0	0	0	0	250	
TOPIC VII OCC/PREP PROG	250	0	0	0	200	0	250	0	0	250	0	250	250	0	677	
TOPIC VIII CAREER/PLACEMENT	267	200	133	153	71	267	0	0	0	200	0	333	65	400	133	
TOPIC IX FINANCIAL STABILITY	0	285	0	0	0	0	0	250	0	250	200	250	0	400	250	
OVER-ALL SCORE	157	109	91	59	89	101	95	87	47	155	42	154	65	327	197	

DATA BASE GROUP MEANS

ARITHMETIC AVERAGES OF SCORES IN THE THREE SUB-GROUPS IN THE SAMPLE, BY TOPIC

	STUDENT MEAN	FACULTY MEAN	ADMINISTRATOR MEAN	NAT'L RANGE	POSSIBLE HIGH
TOPIC I ADMISSIONS	222	159	351	100-400	1,560
TOPIC II DISCLOSURE	49	68	102	50-250	780
TOPIC III REP. OF ACCRED.	0	0	0	0-500	1,330
TOPIC IV REFUND POLICY	162	110	344	100-400	1,125
TOPIC V EVALUATION-STAFF	129	58	103	100-500	1,075
TOPIC VI RECORD KEEPING	28	25	42	125-500	1,125
TOPIC VII OCC/PREP PROGRAM	90	63	236	250-750	2,140
TOPIC VIII CAREER/PLACEMENT	165	67	189	100-500	1,140
TOPIC IX FINANCIAL STABIL.	57	63	225	0-400	1,250
OVER-ALL SCORE	101	83	157	100-300	1,140

Student means are the sum of each student score divided by the number of students participating.

Faculty means are the sum of each faculty score divided by the number of faculty participating.

Administrator means are the sum of each administrator score divided by the number of administrators participating.

All means above taken from THE DATA BASE. National ranges and highest possible numerical scores taken from testing material provided by American Institute of Research, as made available with the survey materials.

NUMERIC ANALYSIS OF RESULTS

Over-all Scores. According to the American Institutes for Research literature, the "national range" for over-all scores of institutions performing in an adequate manner is 100-300. subsamples scored as follows:

National Range	100-300
Students	101
Faculty	83
Administrators	157

As higher scores indicate a higher potential for student abuse, all three over-all scores reflect positively on the college. Interestingly, the administrators' subsample self-scored higher (more potentially abusive) than the other two groups. An analysis of the individual instruments indicates that the administrators in the subsample were involved more completely in the kinds of actions from which student abuse could result, and were generally more sensitive to the potential for it. Their individual comments, however, indicated that they uniformly felt that the potential for abuse did not result in abuse.

Individual Topic Scores. Faculty and student subgroups scored lower than the administrative subgroup on all but two topic items. On topic III regarding the use of statements of accreditation, all subgroups scored zero, and on the topic of systematic evaluation of faculty and staff, the student mean was higher than the administrators, and the faculty--interestingly--scored lowest of all three subgroups.

On Topic I, regarding student recruiting policies and practices, the source of the most points for all groups was the use of testimonials by individuals not having attended the institution and the lack of a written policy governing all recruiting policies. The college does use testimonials

from non-former-students. The individuals used are those who have hired students, and the "testimonials" are reflections of their evaluations of our "product". Former-students are also used, and we feel the policy is consistent with good practice and is a positive reflection on our intention to tell prospective students what others think about the educational product of the college. The lack of a written, all-inclusive statement of policy regarding student recruiting is real, but, in our judgment, non-substantive. A matrix of rules and processes are followed in all recruiting operations which do not lead to potential student abuse, we feel. However, an inclusive policy would be a positive addition to the recruiting system.

On Topic II, regarding disclosures in written documents, the most points were accumulated in items relating to our non-publication of statistics about drop-outs and follow-up statistics on graduates. It is true that the college has not reported consistent statistics on drop-outs and is further true that they have not been consistently collected. We should begin to do this. Failure to report statistics on graduates, however, is not random but planned. The college is just now completing its quadrennial alumni survey, and <u>will</u> publish those summary results. The year following each survey, results are published, but not for the next three years because the information is out of date for most recent graduates, which is the data of most interest to incoming students. Also, the tendency in such material is to select "good examples" of which we have a high number but with which the temptation to misrepresent is rather high. The college has specifically elected to avoid using such measurements.

Responses to Topic III on representation of current approved or accredited status was uniform among all subgroups, and was a score of zero.

Responses to Topic IV on refund policies and practices was mixed. The greatest number of points resulted from responses to the question regarding the existence of non-refundable fees in excess of $100. The college does have such fees in the area of housing commitments, in order to insure that the limited supply relative to demand is effectively commited prior to any term. We have reviewed this policy, and our statements regarding it, and conclude that our policy is effectively and clearly explained and does not constitute a potential for abuse.

Responses to Topic V on instructional staff evaluation and stability showed that the largest number of points resulted from responses to questions regarding the lack of machine scored responses. The evaluation sheets used by the college could be scored mechanically, but lacking the proper equipment, it is done manually by an internal evaluation audit group. The faculty committee on professional standards has been working for two years to design a metric peer-evaluation format, but has been unable to devise one which effectively meets the approval of faculty. The faculty has expressed general approval of the evaluation system combining administrative and student evaluation, and has generally indicated that it did not feel anxious to establish a peer-evaluation system. The need for a machine-scoring mechanism for the student evaluations is sorely felt, and is a priority for the near future.

Responses to Topic VI, regarding record keeping practices, resulted in the highest number of points for questions regarding a written policy for records and retention. Our policy, while not in the faculty or operations handbook, is to retain student records indefinately. After five years in original form, transcripts are micro-filmed and stored. The policy should be in formal, written form, and will be in the next faculty and procedures manuals.

Responses to Topic VII on occupational/professional preparation programs indicate that the points recorded came primarily from the questions on the establishment of advisory committees for all, some or none of the specialized programs. Almost every respondent indicated committees were active in some but not all curricular areas, and that is correct. Plans for other advisory committees have been made and a program to expand the advisory committee system is being activated at this time.

Responses to Topic VIII on career planning and placement services and follow-up of graduates show that the pattern of higher scores concentrate on the questions regarding our follow-up of graduates. Currently the college surveys all graduates every four years, and reports those results. While the four-year survey can be very detailed because of its infrequency, there has been internal concern that it is too infrequent, and this is a very legitimate issue. The college is currently evaluating its rationale for the four-year survey and will soon make a decision regarding that policy.

Responses to Topic IX on financial stability show that points were collected primarily on questions regarding a regular inspection by a State and Federal regulatory agency. Respondents were largely unaware that such inspections <u>are</u> regularly made, and certified audits <u>are</u> provided.

Generally, the self-administered instruments have pointed to some policy areas in which improvement and change could and should logically be instituted. However, an examination of the areas of potential abuse seems to confirm that no substantial real abuse has resulted in those areas, and that abuse which has occured has related to individuals rather than policy, and been very limited. The consistency of scoring by subgroups is significant. The general low level of scores is significant

and indicates a low potential for student abuse.

EVALUATION OF THE INSTRUMENT

As the administration of the instrument was undertaken on a trial basis, the college also focused on an attempt to evaluate the instrument as well as the scores.

There are several difficulties with the instrument.

While students have little difficulty administering the test, some had difficulty following the scoring procedures. The "leaf-through" procedure necessary to score the tests was bothersome to some and there is a possibility they might be less rigorously completed in a large sample if the current format continues.

The reliability of the instrument cannot be measured in a small-sample, one-time, procedure such as the one we undertook, but the validity of certain areas raises some concerns. For example, the topic IX area on financial stability measures whether audited records are available, but not whether or not they show strength. Some Asset: Student ratio might be very helpful in this regard. As it is, the instrument seems to measure whether an institution is forthright, but not whether it is financially strong, which ought to be an important consideration.

Stepping back to a more general view of the instrument, there was some concern among all three of our subgroups regarding the orientation toward "student abuse potential" as expressed in the material. The negative connotation of student abuse potential almost certainly engenders a brand of response--especially in large sample publics--that needs to be carefully normalized if reasonable interpretations are to be made from it. The issue of difference between abuse and potential abuse is also an important one. Although the authors of the materials accompanying

the instrument carefully stress the difference, even after a thorough introduction of it to our small sample, it was initially misunderstood in several cases. One wonders whether the capacity of a system administering a large sample could be able to effectively deal with this issue or whether significant subgroups within a large sample might misunderstand the intent of the instrument.

On the positive side, the survey does pinpoint a number of area of potential abuse. An institution scoring high in an area can be led to an analysis of the validity and substance of the scores and can make an evaluation of the area. Particularly with the growth of non-traditional educational institutions, it is wise and appropriate than some consistent standards of behavior be measured for institutions. This survey technique is one way of getting to that, and has substantial potential for being a useful tool in that process.

APPENDIX E

A Sample ISSF Report

EDUCATION CONSUMER PROTECTION

One Institution's Self-Study

February 1978

Education Consumer Protection:
One Institution's Self Study

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Education Consumer Protection:
One Institution's Self Study

Background

A self study of the content and distribution of information prepared for students and prospective students has been conducted in association with the assembly of other materials for inspection by the Association in its regular accreditation review. Particular attention has been given to policies and practices which are related to educational "consumer" protection, as this term has been used recently in government agencies and educational associations. In accordance with preliminary discussions with Association representatives, a self-study form constructed by the American Institutes for Research was utilized. Inasmuch as this form has been tested with other institutions, it has been possible to obtain the relative standing of the

The Institutional Self-Study Form for Post-Secondary Institutions consists of 123 weighted items on potentially abusive policies and practices, divided into nine categories as follows:

I. Student Recruiting Policies and Practices
II. Disclosure in Written Documents
III. Representation of Approved or Accredited Status
IV. Refund Policies and Practices
V. Instructional Staff Evaluation and Stability
VI. Record-Keeping Practices
VII. Occupational/Professional Preparation Programs
VIII. Career Planning and Placement Services and Follow up of Graduates
IX. Financial Stability

In addition, an overall score is calculated according to the number of items answered by each respondent and the weighted average of their responses to each item

In order to obtain opinions from a range of persons associated with the preparation, dissemination and receipt of institutional information, the instrument was mailed to representative faculty, students and administrators, with an introductory cover letter (see Appendix A). In order to improve the response rate and also to assure that the respondents had some interest in institutional operations, the student and faculty representatives were chosen from the membership of general University committees. Two faculty members and two students were selected from the Council on Teaching and from the Committee on Student Services; one faculty member and

one student from the Committee on Human Rights; one faculty member and one student from the Research Council; one faculty member from the Committee on University Relations and one student from the Committee on Student Health Services, for a total of seven faculty and seven students. An additional seven questionnaires were distributed to members of the University administration in areas directly related to the preparation and dissemination of information about educational practices and policies: the Director of Admissions and Financial Aid; the University Publications Editor; Associate Deans from two of the undergraduate colleges; an Assistant Registrar; the Director of the Educational Placement office and the Director of Residence Halls. Completed questionnaires were received from five of the seven faculty, three of the seven students, and all of the seven administrators.

Although many of the respondents were already familiar with University policies and procedures, the following materials were collected and placed at the disposal of those who wished to review them: University Catalog, Information For Prospective Students, Course Schedule, Financial Aid Handbook, Student Consumer Information summary.

Survey Results

A copy of the Institutional Self Study Form is attached as Appendix B, and responses from participants have been added in the vertical columns for faculty (F), students (S), and administrators (A). The inclusion of this information provides the raw data for further studies if desired, and should answer any questions about the meaning of statements in this report. Numerical summaries of the responses from each of the three groups (faculty, students and administrators) were recorded and averaged separately (see Table 1) in order to disclose any differences in perception from each of the respective points of view. An average of the three different groups was computed in order to get a composite picture of the perceptions within the University. The latter results were then compared with the "expected range" based upon results from those institutions which had utilized the instrument previously.

A summary of the responses from the three groups is presented in Table 2, together with the expected range for each category. A score of zero indicates full approval of our policy or practice in each case. These figures show the following:

1. Responses for the are in the bottom (more favorable) half of the expected range for all categories and for all three constituencies, except that administrators' perceptions were in the upper half of the range concerning "Student Recruiting Policies and Practices".
2. In seven of the ten categories, the faculty responses were even more favorable than the most favorable end of the expected range.

3. In four of the seven categories, students' perceptions were more favorable than the most favorable end of the expected range.
4. In four of the ten categories, the administrators' perceptions were more favorable than the most favorable end of the expected range.

From these results it can be concluded that the faculty, students and administrators who were surveyed have a very favorable perception of the University's policies and practices with reference to educational consumer protection.

When the responses of the three groups are compared to determine the differences in perception within the institution, it is found that:

1. Faculty are most critical in one category and least critical in five;
2. Students were most critical in three categories and least critical in one;
3. Administrators were most critical in five categories and least critical in three;
4. All three constituencies agreed on one category (financial stability) which received the only perfect score.

From this result it might be concluded that those who are most knowledgeable about the procedures are also the most critical; however, this assumption should be examined more closely.

Most favorable areas. When the results are examined to determine which types of policies and practices are perceived as most favorable by each of the three groups, a significant degree of agreement is found. The categories in each set below are listed with the most favorable first, etc.:

1. Faculty -- Representation of Approved or Accredited Status; Career Planning/Placement and Followup of Graduates; Financial Stability
2. Students -- Financial Stability; Record-keeping Practices; Refund Policies and Practicies
3. Administrators -- Record-keeping Practices; Financial Stability; Refund Policies and Practices
4. Overall -- Financial Stability; Refund Policies and Practices; Record-keeping Practices.

Least favorable. The three groups had the least favorable impressions about areas as follows. In each case the least favorable category is listed first:

1. Faculty -- Record-keeping Practices; Instructional Staff Evaluation and Stability; Occupational/Professional Preparation Programs.

2. Students -- Occupational/Professional Preparation Programs; Representation of Approved or Accredited Status; Student Recruiting Policies and Practices.
3. Administrators -- Student Recruiting Policies and Practices; Occupational/Professional Preparation Programs; Career Planning/Placement and Followup of Graduates.
4. Overall -- Occupational/Professional Preparation Programs; Student Recruiting Policies and Practices; Instructional Staff Evaluation and Stability.

From these results two conclusions can be drawn: First of all, there is a consensus that the institution has excellent financial stability. The second conclusion is also encouraging because it tends to offset the initial impression mentioned above that those who are most familiar are also most critical: The results show that students are most favorably disposed towards those areas which affect them most directly, faculty are favorably disposed towards those areas about which they know the most (with the notable exception of the inclusion of teaching performance in faculty evaluation), and administrators are most favorably disposed towards the areas in which they are directly involved. With reference to the unfavorable impressions, it should be noted that the poor ranking by faculty of record keeping practices is a result of an unfavorable impression by a single person (see Table 1). This is given added significance when it is seen that record-keeping practices are considered most favorable by the administrators and second most favorable by the students. It also appears that the overall impressions are least favorable concerning the operation of academic and recruiting programs.

Concerns and Recommendations

Although it is encouraging to learn that students, faculty and administrators are favorably impressed overall by our policies and practices, improvement of the system will be achieved only by giving attention to the problem areas. Since the item "Occupational/Professional Preparation Programs" had the highest scores, the questions in that group might be examined to identify more clearly our perceived deficiencies (Appendix B, p. 18). The item in this section having the largest number of weighted responses relates to the inclusion of representatives of potential employers on committees to advise on curriculum content and equipment. Professional programs do take characteristics of employment opportunities for graduates into account in designing curriculum. However, the appropriateness of formally including external employees on advisory committees can be questioned.

Students and administrators were also mildly critical about "Student Recruiting Policies and Practices" (Appendix B, p. 2). An examination of the responses indicates that our policies on recruitment are not clearly stated, nor are respondents aware of whether practices are closely supervised by a "responsible administrative officer". This is especially significant when

administrators in related areas are skeptical. It is recommended that the policies and practices related to preadmission contacts be organized in a clear and complete form, and then reviewed systematically. Some respondents also gave demerits for the absence of remedial courses or sections in basic English and Mathematics, apparently unaware of our reading and writing laboratories or not equating them with "courses or sections" of courses.

Some apparently unfavorable responses were obtained, especially from faculty, about "Instructional Staff Evaluation and Stability" (Appendix B, p. 15). It should be noted, however, that essentially all of these responses occurred for four specific questions: 2-d concerning evaluation of instruction by graduates, 2-e concerning the use of instructional self-ratings, and 4-c and 4-d related to systematic evaluations of all regularly appointed faculty members and all adjunct faculty. Institutional policies do require that evidence of teaching performance be submitted in relation to promotion and tenure recommendations. The appropriateness and reliability of teaching evaluations by graduates after they have left the institution can be questioned, as can the reliability and validity of instructional self ratings. Thus, it is not clear that the inclusion of such evaluations would meaningfully enhance evaluation of instruction. It also should be noted that, although overall University policy does not specify a particular system for evaluation of tenured or adjunct faculty, such evaluations are routinely carried out within academic units in relation to salary increases for all faculty and the reappointment of adjunct faculty. The advantages and disadvantages of establishing more systematic evaluations of faculty in these two groups probably should be explored.

Administrators in the survey were somewhat critical of our "Career Planning and Placement Services and Followup of Graduates" (Appendix B, p. 21). An analysis of the responses shows that the survey instrument gives demerits for charging a fee, and that our followup of graduates and drop-outs is perceived as being inadequate. Each of the placement offices is aware of the desirability of more thorough collection of information about the continuing experiences of former students, but this aspect has been accorded a lower priority than career counseling of currently enrolled students and placement in jobs or post-graduate educational programs.

A study of drop-outs was recently completed, but the results were apparently unknown to the respondents. They were also apparently unaware of the University's participation in a Survey of Recent College Graduates which is being conducted currently by the National Opinion Research Center and the National Center for Educational Statistics. This survey is designed to provide answers to questions such as:

How do graduates who enter the job market fare in their search for jobs?

How many graduates are underemployed and in what fields?

How many choose to get a further degree rather than enter the labor market upon graduating?

A sample of graduates in all programs for the years 1971-72, 1975-76 and 1976-77 will be polled, and the results of the national sample as well as the experience of our own graduates will be provided for our use.

Although our perceived performance on "Disclosure in Written Documents" was comparatively good, many deficiencies were pointed out because of the large number of specific possibilities included in this category (see Appendix B, p. 5). Our catalog or other basic public information documents were criticized for inadequate disclosure of:

Statement of institutional philosophy or mission
Description of physical facilities as related to the instructional program
An indication of when specific required courses will normally be offered
Acceptability by other institutions of credits earned at Iowa
Data regarding the employment success of graduates from undergraduate and graduate occupational/professional preparation programs
Data on drop-outs
Grading system
Absences or excessive late arrival for classes, and make-up work

Our public documents were also criticized for not disclosing the standard legal limitations for employment in some occupations, and for not adequately informing the public about our placement, counseling, and food services, as well as housing the parking facilities. It is recommended that documents designed to inform the public be reviewed by appropriate administrators.

Two respondents noted that there have been problems associated with meeting the standards of a federal agency, (Appendix B, p. 10) and with accrediting agencies, and asked whether the "limitation(s) or sanction(s) (have been) publicly disclosed in writing to all current enrollees and applicants". It is recommended that this question be reviewed, although it should be noted that everyone who is or might be affected has been notified whenever problems of this type have been encountered.

Summary

In summary, the is viewed internally as being far above average in its policies and practices to protect the rights of students to fair treatment. Students, faculty and administrators all share this view, and the highest ratings go to financial and record-keeping operations. Problems are perceived

in most areas, however, in spite of the generally good performance. The table on page 8 provides a quick overview of the problem areas and recommended approaches to their solutions.

Usefulness of the Self-Study Form

The 123 items in the survey appear to cover adequately the various types of information associated with potentially abusive practices and policies related to "student consumerism". Because of this thoroughness, several of our respondents commented that they could not adequately assess our performance in all categories. This reaction might have been expected and does not necessarily imply a flaw in the design of the instrument. It does suggest, however, that care should be used in selecting the sample so that at least one person in the sample (and preferably more than one) is well-informed on each item. This procedure will help insure that potential problems do not escape detection because none of the respondents is familiar with the area.

For similar reasons, the position of the individual respondent should be considered in evaluating the significance of responses. For example, a favorable response by a large majority in connection with a specific item might have little significance in comparison with the unfavorable responses of those who are best informed about the relevant area. Conversely, an unfavorable response might indicate only that the person is unaware of the policy or practice at issue.

In general, the results of the form should be used as an indication of potential problems which might otherwise have escaped detection, rather than as either an indictment or proof of perfection. This means, for example, that an unfavorable response should not be discounted simply because it represents a small minority of the sample or even because the person may have been ill-informed. Someone in a responsible position should be assigned to review <u>each</u> unfavorable observation with instructions:

a) to correct the policy or practice if the criticism is justified;
b) to bring relevant policies to the attention of all affected persons who might not be aware and consequently might be unfairly critical.

If the above comments and suggestions are valid, then one might question the value of the information on "expected range" of results. A relatively poor score might spur an institution to urgent action in making corrections, in which case the comparison could serve a useful purpose. On the other hand, a relatively good score could encourage an institution to neglect or postpone corrective action where real deficiencies exist. Par performance should not be merely the "average" or "expected range", but rather it should be full compliance with the principles of good practice. It is in this spirit that specific actions have been recommended in this report, for each item where a potential problem was indicated.

ITEM	PERCEIVED STATUS	RECOMMENDATION
Financial Stability	Excellent (No perceived deficiencies)	Maintain the present high standards; compliments to those responsible.
Refund Policies and Practices	Lack of time limitation on processing refunds, and non-refunded fees not always proportional to instruction received.	Publicize the time schedule, and review the refund policy.
Record-Keeping Practices	No disclosure of identification of officer making award; no written policy for records if the institution closes.	Include name of financial aid counselor in each student folder. Add catalog secton on access to records in event of institutional closure.
Disclosure in Written Documents	Inadequate disclosure on: when courses are offered, success of graduates and drop-outs, and other scattered items.	Documents should be reviewed and modified.
Representation of Approved or Accredited Status	Problems with accreditation and federal agencies, and non-disclosure of same to enrollees and applicants.	Review the methods by which such information is disseminated, and to whom.
Carrer Planning/Placement Services, and Followup of Graduates	Inadequate followup of graduates and drop-outs.	Disseminate and review the results of a survey now in progress, and of a recently completed survey of drop-outs.
Instructional Staff Evaluation and Stability	No systematic evaluation of teaching specifically required from graduates or by self evaluation, nor for tenured or adjunct faculty.	More information should be collected on the advisability of such evaluation policies.
Student Recruiting Policies and Practices	Need clearly stated written policies, reviewed and supervised by responsible administrators; Inadequate remedial programs.	Collect and record the policies, for review by relevant committees. Clarify responsibilities. Review and promote remedial programs.
Occupational/Professional Preparation Programs	Lack of involvement of employers, accrediting agencies, institutional committees.	Request each department or college which offers occupational or professional preparation programs to review this area.

Table 1. Summary of Individual Responses

	I	II	III	IV	V	VI	VII	VIII	IX	Inst.
FACULTY	188	0	0	63	77	0	0	0	0	44
	0	90	0	0	182	0	429	0	0	75
	0	125	0	0	250	1000	125	0	0	40
	0	0	0	0	0	0	0	0	0	0
	0	75	0	65	150	0	125	0	0	55
Totals	188	290	0	128	659	1000	679	0	0	214
Averages	38	58	0	26	132	200	136	0	0	43
STUDENTS	158	154	600	125	416	125	750	133	0	215
	167	0	0	0	0	0	250	0	0	81
	167	0	0	0	0	0	250	0	0	81
Totals	492	154	600	125	416	125	1250	133	0	377
Averages	164	51	200	42	137	42	417	44	0	126
ADMINISTRATORS	154	382	600	67	182	0	250	333	0	270
	0	0	0	0	182	0	250	665	0	41
	185	210	0	0	0	0	1000	500	0	215
	435	90	200	0	190	0	665	210	0	200
	185	0	0	0	90	0	0	110	0	45
	0	0	0	0	0	0	0	230	0	40
	425	0	0	0	0	0	1000	0	0	110
Totals	2384	682	800	67	644	0	3165	2048	0	921
Averages	341	97	114	10	92	0	452	293	0	132

Table 2. Summary of Responses Grouped According to Faculty, Students and Administrators

		Expected Range	Faculty N=5	Student N=3	Adm. N=7	Avg. N=3
I.	Student recruiting policies and Practices	100-400	38	164	341	181
II.	Disclosure in written documents	50-250	58	51	97	67
III.	Representation of approved or accredited status	0-500	0	200	114	105
IV.	Refund policies and practices	100-400	26	42	10	26
V.	Instructional staff evaluation and stability	100-500	132	137	92	120
VI.	Record keeping practices	125-500	200	42	0	81
VII.	Occupational/professional preparation programs	250-750	136	417	452	335
VIII.	Career planning/placement follow up of graduates	100-500	0	44	293	112
IX.	Financial stability	0-400	0	0	0	0
	Institution	100-300	43	126	132	100